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SUMMONS (CITACION JUDICIAL)

SUM-100

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)**ELECTRONICALLY FILED**Superior Court of California,
County of KernBy: Javen Silva
Deputy Clerk

07/14/2026

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

COUNTY OF KERN, a public entity; KERN COUNTY DISTRICT ATTORNEY'S OFFICE, a public entity; GINA PEARL, an individual; CYNTHIA ZIMMER, an individual; KENNETH RUSSELL, an individual; and DOES 1 through 50, inclusive

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

JANAE KNALLAY, an individual,

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

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

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

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

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

The name and address of the court is:

(El nombre y dirección de la corte es): Metro Division

1215 Truxtun Avenue, Bakersfield, CA 93301

CASE NUMBER:
(Número del Caso):

26CUB02678

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):

Emilia Arutunian, Esq.; 402 W Broadway, Fl. 21, San Diego, CA 92101; Email: Emilia@antonyanmiranda.com; Phone: (619)696-1100

DATE:

(Fecha)

07/14/2026

Tara Leal

Clerk, by

(Secretario)

Javen Silva

Deputy

(Adjunto)

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

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

[SEAL]

**NOTICE TO THE PERSON SERVED: You are served**

1. ☐ as an individual defendant.

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

3. ☒ on behalf of (specify): **COUNTY OF KERN, a public entity**

under: ☐ CCP 416.10 (corporation)

☐ CCP 416.20 (defunct corporation)

☐ CCP 416.40 (association or partnership)

☒ other (specify): **Public Entity**

☐ CCP 416.60 (minor)

☐ CCP 416.70 (conservatee)

☐ CCP 416.90 (authorized person)

4. ☐ by personal delivery on (date):

Page 1 of 1

ATTORNEY OR PARTY WITHOUT ATTORNEY NAME: Emilia A. Arutunian, Esq. FIRM NAME: Antonyan Miranda, LLP STREET ADDRESS: 402 West Broadway, Fl. 21 CITY: San Diego TELEPHONE NO.: (619) 696-1100 EMAIL ADDRESS: Emilia@antonyanmiranda.com ATTORNEY FOR (name): Plaintiff		STATE BAR NUMBER: 305824 STATE: CA ZIP CODE: 92101 FAX NO.:	FOR COURT USE ONLY ELECTRONICALLY FILED Superior Court of California, County of Kern By: Javen Silva Deputy Clerk 07/13/26 11:29 AM
SUPERIOR COURT OF CALIFORNIA, COUNTY OF KERN STREET ADDRESS: 1215 Truxtun Avenue MAILING ADDRESS: 1215 Truxtun Avenue CITY AND ZIP CODE: Bakersfield 93301 BRANCH NAME: Metro Division		CASE NUMBER: 26CUB02678 JUDGE: DEPT.:	
CASE NAME: Knallay v. County of Kern, et al.			
CIVIL CASE COVER SHEET ☒ Unlimited (Amount demanded exceeds \$35,000) ☐ Limited (Amount demanded is \$35,000 or less)		Complex Case Designation ☐ Counter ☐ Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)	

Items 1–6 below must be completed (see instructions on page 2 and examples on page 3).

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

Auto Tort ☐ Auto (22) ☐ Uninsured motorist (46) Asbestos ☐ Asbestos (04) Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort ☐ 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) ☐ Song-Beverly Act: Motor Vehicle Lemon Law (49) ☐ Rule 3.740 collections (09) ☐ Other collections (09) ☐ Insurance coverage (18) ☐ Other contract (37) Real Property ☐ Eminent domain/Inverse condemnation (14) ☐ Wrongful eviction (33) ☐ Other real property (26) Unlawful Detainer ☐ Commercial (31) ☐ Residential (32) ☐ Drugs (38) Judicial Review ☐ Asset forfeiture (05) ☐ Petition re arbitration award (11) ☐ Writ of mandate (02) ☐ Other judicial review (39) Employment Development Department (EDD) ☐ EDD decision review (48)	Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400–3.404) ☐ Antitrust/Trade regulation (03) ☐ Construction defect (10) ☐ Mass tort (40) ☐ Securities litigation (28) ☐ Environmental/Toxic tort (30) ☐ Comprehensive groundwater adjudication (47) ☐ 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)
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BY ORDER OF THE BD/SUPV

Referred To County Counsel
38 pages

Copies Furnished Disb Manager

Date 8/21/26

Clerk of the Board of Supervisors Page 1 of 3

By Michelle Gray, Deputy

2. Is this case complex under rule 3.400 of the California Rules of Court? ☐ Yes ☒ No

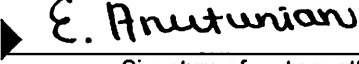
If the case is complex, mark the factors requiring exceptional judicial management:

- a. ☐ Large number of separately represented parties
 b. ☐ Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve
 c. ☐ Substantial amount of documentary evidence
 d. ☐ Large number of witnesses
 e. ☐ Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
 f. ☐ Substantial postjudgment judicial supervision
3. Remedies sought (*check all that apply*):
 a. ☒ monetary
 b. ☒ nonmonetary; declaratory or injunctive relief
 c. ☒ punitive
4. Number of causes of action (*specify*): 9
5. Is this case a class action suit? ☐ Yes ☒ No
6. If there are any known related cases, file and serve a notice of related case. (*You may use form CM-015.*)

Date: July 1, 2026

Emilia A. Arutunian, 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, or a collections case under rule 3.740, you must serve a copy of this cover sheet on all other parties to the action or proceeding. (Cal. Rules of Court, rule 3.220.)
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

INSTRUCTIONS ON HOW TO COMPLETE THE 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 pages 1 and 2. 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 on page 3 of this form. 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 of the California Rules of Court is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$35,000, 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.

SEE PAGE 3 FOR INFORMATION PURPOSES ONLY.



CASE TYPES AND EXAMPLES

The list below provides explanations and examples for the case type checkboxes listed in item 1 on this form. The lists of examples below are not meant to be exhaustive, and some case types may have causes of action not listed here.

Auto Tort

- Auto (22)—Personal Injury/Property Damage/
Wrongful Death
- Uninsured Motorist (*if the case involves an
uninsured motorist claim subject to
arbitration, check this item instead of Auto*)
(46)

Asbestos

- Asbestos (04)
- Asbestos Property Damage
- Asbestos Personal Injury/Wrongful Death

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

- Product Liability (*not asbestos or
environmental/toxic tort*) (24)
- Medical Malpractice (45)
 - Medical Malpractice—Physicians &
Surgeons
 - Other Professional Health Care
Malpractice
- Other PI/PD/WD (23)
 - Premises Liability (e.g., slip and fall)
 - Intentional Bodily Injury/PD/WD (e.g.,
assault, vandalism)
 - Intentional Infliction of Emotional Distress
 - Negligent Infliction of Emotional Distress
- Other PI/PD/WD

Non-PI/PD/WD (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)
- Fraud (*other than contract*) (16)
- Intellectual Property (19)
- Professional Negligence (25)
 - Legal Malpractice
 - Other Professional Malpractice
(*not medical*)
- Other Non-PI/PD/WD 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*)
- Negligent Breach of Contract/Warranty
- Other Breach of Contract/Warranty
- Song-Beverly Act: Motor Vehicle Lemon Law
(*check this item if the case involves a Song-
Beverly Act claim regarding a motor
vehicle*) (49)
- Rule 3.740 Collections (*as defined in Cal.
Rules of Court, rule 3.740(a)*) (09)
- Other Collections (e.g., money owed, open
book accounts, promissory note) (09)
- 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 unlawful
detainer*)

Unlawful Detainer

- Commercial (31)
- Residential (32)
- Drugs (*if the case involves illegal drugs, check
this item; otherwise, choose Commercial or
Residential*) (38)

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

Employment Development Department (EDD)

- EDD Decision Review (*if the case involves an
Employment Development Department
decision, check this item instead of
wrongful termination or other employment*)
(48)

Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400–3.404)

- Antitrust/Trade Regulation (03)
- Construction Defect (10)
- Mass Tort (40)
- Securities Litigation (28)
- Environmental/Toxic Tort (30)
- Comprehensive Groundwater Adjudication
(47)
- 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
 - 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*)
 - Mechanic's 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 Government
Claim Requirement
 - Other Civil Petition

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Attorneys for Plaintiff
Janae Knallay

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF KERN

JANAE KNALLAY, an individual,

Plaintiff,

v.

COUNTY OF KERN, a public entity; KERN
COUNTY DISTRICT ATTORNEY'S OFFICE,
a public entity; GINA PEARL, an individual;
CYNTHIA ZIMMER, an individual;
KENNETH RUSSELL, an individual; and
DOES 1 through 50, inclusive,

Defendants.

) **Unlimited Civil**

) **Case No.: 26CUB02678**

) **COMPLAINT FOR DAMAGES AND**
) **DEMAND FOR JURY TRIAL**

-) (1) **DISABILITY DISCRIMINATION**
) **(FEHA, GOV. CODE § 12940(A))**
-) (2) **RETALIATION FOR EXERCISING**
) **FEHA RIGHTS (GOV. CODE §**
) **12940(H))**
-) (3) **RETALIATION FOR TAKING**
) **MEDICAL LEAVE (CFRA/FMLA,**
) **GOV. CODE § 12945.2; 29 U.S.C. §**
) **2615)**
-) (4) **FAILURE TO ACCOMMODATE**
) **(GOV. CODE § 12940(M))**
-) (5) **FAILURE TO ENGAGE IN THE**
) **INTERACTIVE PROCESS (GOV.**
) **CODE § 12940(N))**
-) (6) **FAILURE TO PREVENT**
) **DISCRIMINATION AND**
) **RETALIATION (GOV. CODE §**
) **12940(K))**
-) (7) **HARASSMENT BASED ON**
) **DISABILITY (GOV. CODE § 12940(J))**
-) (8) **CONSTRUCTIVE DISCHARGE IN**
) **VIOLATION OF PUBLIC POLICY**
-) (9) **NEGLIGENT SUPERVISION**

INTRODUCTION

1. Plaintiff JANA E KNALLAY ("Plaintiff" or "Ms. Knallay") brings this action against Defendants COUNTY OF KERN, KERN COUNTY DISTRICT ATTORNEY'S OFFICE, GINA PEARL, CYNTHIA ZIMMER, KENNETH RUSSELL, and DOES 1 through 50, inclusive (collectively "Defendants"), for disability discrimination, retaliation, failure to accommodate, failure to engage in the interactive process, failure to prevent discrimination and retaliation, harassment based on disability, constructive discharge in violation of public policy, and negligent supervision, all arising from Defendants' unlawful conduct during Plaintiff's employment with the Kern County District Attorney's Office.

2. Ms. Knallay devoted nearly nine years of her professional life to public service as a Deputy District Attorney at the Kern County District Attorney's Office. She rose to the position of Deputy District Attorney IV, earning uninterrupted positive performance evaluations, promotions, commendations, and statewide recognition as the office's leading human trafficking prosecutor. In the 2024 calendar year, she was recognized as the office's "Prosecutor of the Year" by elected District Attorney Cynthia Zimmer.

3. Throughout her career, Ms. Knallay was transparent with every supervisor about her serious physical disabilities, including a condition causing severe, debilitating migraine episodes requiring temporary rest, and a subsequent cancer diagnosis and surgery and extended medical leave. For more than seven years, her conditions were known to her supervisors and were never treated as a limitation on her performance or a basis for any employment action. She continued to work through her serious illness, delayed her own medical treatment to complete jury trials, and returned to full-time duty following surgery—all without missing a step.

4. Everything changed on April 28, 2025, when Gina Pearl became Ms. Knallay's direct supervisor. Within weeks of assuming that role, Ms. Pearl began targeting Ms. Knallay's medical condition, scrutinizing her use of a previously approved accommodation, stripping her of high-profile cases, and portraying her disability-related conduct as performance deficiencies. On December 5, 2025—three days after Ms. Knallay notified the County that she would be taking protected medical leave—she received her first-ever Letter of Reprimand in nearly nine years of service. That reprimand was

1 pretextual, factually inaccurate, and issued in direct retaliation for Ms. Knallay's exercise of protected
2 rights.

3 5. Faced with a hostile and intolerable work environment, Ms. Knallay was left with no reasonable
4 alternative but to resign. Her resignation, submitted on January 7, 2026, was a constructive discharge.
5 Even after her resignation, Defendants continued their retaliatory conduct by sending escalating
6 demands to Ms. Knallay's personal residence while she remained on protected medical leave, creating
7 the false impression that she had withheld case materials—an accusation she fully rebutted. After an
8 exhaustive review of all her devices and files, Ms. Knallay confirmed she did not possess a single item
9 the District Attorney's Office had implied she was withholding.

10 6. As a direct and proximate result of Defendants' conduct, Ms. Knallay has suffered significant
11 economic losses, damage to her professional reputation, and severe emotional distress. She brings this
12 action to vindicate her rights and to obtain all remedies available under California and federal law.

13 PARTIES

14 7. Plaintiff JANA E KNALLAY is an individual who, at all times relevant herein, resided in the
15 County of Kern, State of California. She was employed by the Kern County District Attorney's Office
16 as a Deputy District Attorney from April 3, 2017 until her constructive discharge effective on or about
17 January 7, 2026.

18 8. Defendant COUNTY OF KERN ("County") is a public entity organized and existing under the
19 laws of the State of California. The County operates the Kern County District Attorney's Office and is
20 the employer of the individual defendants named herein.

21 9. Defendant KERN COUNTY DISTRICT ATTORNEY'S OFFICE ("DA's Office") is a public
22 entity and a department of the County of Kern. At all relevant times, Ms. Knallay was employed by the
23 DA's Office as a Deputy District Attorney IV.

24 10. Defendant GINA PEARL ("Ms. Pearl") is an individual who, at all relevant times, was employed
25 by the Kern County District Attorney's Office. On April 28, 2025, Ms. Pearl became Ms. Knallay's direct
26 supervisor. She is sued in both her individual and official capacities.

27 11. Defendant CYNTHIA ZIMMER ("DA Zimmer") is an individual who, at all relevant times,
28 served as the elected District Attorney of Kern County. DA Zimmer is the head of the Kern County

1 District Attorney's Office and at all relevant times had authority over personnel decisions, including the
2 issuance of formal discipline and the failure to remedy the hostile work environment directed at Ms.
3 Knallay. She is sued in both her individual and official capacities.

4 12. Defendant KENNETH RUSSELL ("ADA Russell") is an individual who, at all relevant times,
5 served as an Assistant District Attorney of Kern County. He is sued in both his individual and official
6 capacities.

7 13. The true names and capacities—whether individual, corporate, associate, or otherwise—of
8 Defendants named herein as DOES 1 through 50 are presently unknown to Plaintiff, who therefore sues
9 those Defendants by such fictitious names. Plaintiff is informed and believes, and on that basis alleges,
10 that each fictitiously named Defendant is legally responsible in some manner for the occurrences alleged
11 herein, and that Plaintiff's damages as alleged herein were proximately caused by those Defendants.
12 Plaintiff will seek leave to amend this Complaint to allege their true names and capacities when they are
13 ascertained.

14 14. Plaintiff is informed and believes, and on that basis alleges, that at all times herein mentioned,
15 each of the Defendants was the agent, employee, or representative of the other Defendants, and in doing
16 the things alleged herein, each Defendant was acting within the scope of such agency, employment, or
17 representation, and each Defendant ratified and approved the acts of every other Defendant.

18 **JURISDICTION AND VENUE**

19 15. *Jurisdiction and Venue:* This Court has jurisdiction over this matter pursuant to California Code
20 of Civil Procedure section 410.10. The amount in controversy exceeds the minimum jurisdictional
21 threshold of this Court.

22 16. Venue is proper in this Court pursuant to California Code of Civil Procedure section 395 because
23 the acts and omissions giving rise to Plaintiff's claims occurred within the County of Kern, and
24 Defendants reside in and/or conduct business within the County of Kern.

25 **EXHAUSTION OF ADMINISTRATIVE REMEDIES**

26 17. Prior to filing this Complaint, Plaintiff timely filed a Government Tort Claim against Defendant
27 County of Kern pursuant to Government Code sections 910, 910.2, and 910.4. The claim was filed in
28

1 May 2026. The County has not resolved Plaintiff's claim, and Plaintiff is therefore entitled to proceed
2 with this civil action.

3 18. Prior to filing this Complaint, Plaintiff timely filed a charge of discrimination and retaliation
4 with the California Civil Rights Department ("CRD") and the Equal Employment Opportunity
5 Commission ("EEOC"). Plaintiff has received, or will receive, a right-to-sue notice from the CRD and/or
6 the EEOC authorizing the filing of this action, attached herein as Exhibit A. All administrative
7 prerequisites to the filing of this lawsuit have been satisfied or will be satisfied prior to trial.

8 **FACTS COMMON TO ALL CAUSES OF ACTION**

9 **A. A Career Defined by Excellence**

10 19. Plaintiff Janae Knallay began her employment with the Kern County District Attorney's Office
11 on April 3, 2017, as a Deputy District Attorney. Through years of exceptional performance, she rose to
12 the position of Deputy District Attorney IV.

13 20. From the outset of her employment, Ms. Knallay was transparent with every supervisor
14 regarding her serious physical disability, which caused severe and debilitating episodes requiring
15 temporary periods of rest. For more than seven years, her condition was known to her supervisors and
16 was never treated as a limitation on her performance or a basis for any employment action.

17 21. Ms. Knallay handled some of the most serious and emotionally demanding cases in the office,
18 including human trafficking prosecutions and cases involving vulnerable victims. She consistently
19 worked weekends, sacrificed personal time, and prioritized the needs of victims and the public.

20 22. Ms. Knallay's personnel file reflects uninterrupted positive performance evaluations,
21 commendations, and promotions throughout her tenure. She was widely recognized within the DA's
22 Office and among law enforcement agencies across California as the office's leading human trafficking
23 prosecutor. Human trafficking cases were routinely routed to her based on her expertise and established
24 working relationships with specialized law enforcement units.

25 23. In nearly nine years of service, Ms. Knallay was never disciplined—not once—until she became
26 seriously ill.

27 ///

28 ///

B. Cancer Diagnosis and Continued Dedication

24. In 2024, Ms. Knallay was diagnosed with cancer requiring surgery and extended medical leave. Despite the gravity of that diagnosis, she continued to work. During the period between her diagnosis and surgery, she handled multiple back-to-back jury trials, including complex human trafficking cases, while simultaneously undergoing medical testing and managing the severe symptoms of her illness.

25. Ms. Knallay delayed her own medical treatment in order to fulfill her obligations to the office and to the victims she served. She traveled for medical testing on weekends while continuing to appear in court and prosecute cases during the week.

26. Shortly after her surgery, the County and DA's Office recognized Ms. Knallay's extraordinary contributions by awarding her the office's "Prosecutor of the Year" award for the 2024 calendar year. At the time of the award, elected District Attorney Cynthia Zimmer publicly recognized Ms. Knallay's contributions. DA Zimmer stated in writing that Ms. Knallay had "become the most knowledgeable prosecutor in addressing these difficult [human trafficking] cases," that her circumstances were "in a word, horrifying," and that her "commitment to her craft and to justice for the people of Kern County is commendable."

27. In connection with the Prosecutor of the Year award, and in recognition of Ms. Knallay's continued exceptional work, DA Zimmer approved a three-step increase to Ms. Knallay's salary and her advancement to Deputy District Attorney IV, Step 8, effective June 2025.

28. Following surgery, Ms. Knallay took approximately three months of protected medical leave. Upon returning to work in March 2025, she immediately resumed her full duties and caseload. Within weeks of her return, she received a positive performance evaluation in April 2025.

29. Between March and December 2025, Ms. Knallay completed 75 days in jury trial. During 2024, while managing her serious illness, she completed more Human Trafficking jury trials than any prosecutor in the State of California. She was awarded the "Award for Excellence in Human Trafficking Prosecutions" by the statewide California Human Trafficking Investigators and Prosecutors Association—the only prosecutor in California to receive that recognition.

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C. Change in Supervision and the Targeting of Ms. Knallay's Medical Condition

30. On April 28, 2025, Defendant Gina Pearl became Ms. Knallay's direct supervisor. This change marked a turning point in Ms. Knallay's employment.

31. For the first time in her career, Ms. Knallay was asked by Ms. Pearl to provide medical documentation regarding her disability. Ms. Pearl initiated an interactive process meeting, not because of any performance deficiency, but under the pretext of addressing a condition that had already been successfully managed for more than seven years without issue.

32. During this period, Ms. Knallay repeatedly asked Ms. Pearl whether there were concerns about her performance. Ms. Pearl assured her that there were none and that the interactive process was not disciplinary in nature.

33. At the same time, however, Ms. Pearl was portraying Ms. Knallay's medically related conduct as problematic to Human Resources, suggesting to HR that Ms. Knallay's disability-related absences required additional staffing. Ms. Pearl thus acknowledged that Ms. Knallay's conduct was caused by a medical condition while simultaneously framing that same conduct as a performance deficiency. This dual messaging was not an oversight—it was a deliberate effort to build a pretextual record against Ms. Knallay.

D. Systemic Undermining of Ms. Knallay's Professional Role

34. Shortly after Ms. Pearl assumed supervisory authority, a high-profile human trafficking case arose involving a suspect with connections across multiple jurisdictions. A Sacramento-based human trafficking detective and a Bakersfield Police Department detective separately alerted Ms. Knallay to the case, consistent with longstanding practice given her role as the office's subject-matter expert.

35. In compliance with office policy, Ms. Knallay promptly notified Ms. Pearl of the potential media-sensitive case and provided the suspect's name. Rather than coordinating a response, Ms. Pearl questioned how Ms. Knallay had learned of the case. When Ms. Knallay explained that law enforcement contacts had informed her—as they routinely did—Ms. Pearl escalated the matter by contacting leadership within the Bakersfield Police Department to complain that the case had not been routed through her first.

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1 36. Ms. Pearl then refused to assign the case to Ms. Knallay, claiming it "had to be handled by a
2 supervisor" due to its likely media attention. This stated justification was false. Approximately one
3 month later, Ms. Pearl reassigned the same high-profile human trafficking case not to a supervisor, but
4 to another deputy district attorney who had no specialized experience in human trafficking prosecutions.

5 37. Law enforcement officers familiar with Ms. Knallay's expertise questioned the reassignment
6 decision, expressing confusion as to why the case had not been assigned to her.

7 38. This incident was not isolated. It reflected a broader pattern in which Ms. Pearl sought to
8 diminish Ms. Knallay's role, remove high-profile case opportunities, and undermine the professional
9 credibility she had spent years building.

10 **E. The Interactive Process Used as a Tool of Scrutiny**

11 39. Ms. Knallay requested a reasonable accommodation that would allow her to manage her
12 disability-related symptoms while continuing to perform her work duties: resting briefly in a dark room
13 during a severe symptomatic episode and then returning to work. The accommodation was approved
14 and was effective.

15 40. Rather than treating the approved accommodation as a resolution, Ms. Pearl treated it as a basis
16 for ongoing monitoring and scrutiny. Ms. Knallay's use of the accommodation—conduct expressly
17 approved by the employer—was tracked and later incorporated into a false narrative that Ms. Knallay
18 was failing to meet performance expectations.

19 41. The required follow-up review of the accommodation was never conducted. The process was
20 intentionally left open-ended, allowing Ms. Pearl to continue monitoring Ms. Knallay's condition and
21 disability-related conduct.

22 42. In effect, conduct that Ms. Pearl knew to be medically necessitated was deliberately repackaged
23 and weaponized as evidence of a performance problem.

24 **F. Retaliatory Escalation Following Use of Approved Accommodation**

25 43. Between November 13 and November 17, 2025, Ms. Knallay experienced multiple severe
26 symptomatic episodes caused by her disability and appropriately notified Ms. Pearl each time she
27 utilized her approved accommodation. Ms. Pearl was fully aware that these episodes were medically
28

1 driven: she had initiated the interactive process, had reviewed the medical documentation, and had
2 approved the accommodation.

3 44. On November 17, 2025, immediately after Ms. Knallay invoked her approved accommodation,
4 Ms. Pearl sent Ms. Knallay an individualized email directing her to prioritize her at-large caseload. This
5 was the first time in Ms. Knallay's career that she had ever been singled out in this manner. From that
6 point forward, Ms. Knallay was subjected to heightened scrutiny, shifting and undefined performance
7 expectations, and criticism that had never previously occurred.

8 **G. Pretextual Letter of Reprimand**

9 45. On December 2, 2025, Ms. Knallay notified the County that she would be taking protected
10 medical leave. On December 5, 2025—three days after providing that notification, and on her final
11 working day before beginning leave—Ms. Knallay received her first-ever Letter of Reprimand in nearly
12 nine years of service.

13 46. The reprimand relied heavily on allegations regarding Ms. Knallay's at-large caseload. These
14 allegations were contradicted by objective facts. After being directed on November 17, 2025 to prioritize
15 her at-large cases, Ms. Knallay reduced her caseload from 24 cases to 12 cases in approximately two
16 weeks—while simultaneously engaged in jury trial and managing complex cases involving hundreds of
17 pages of material.

18 47. On information and belief, other deputy district attorneys under Ms. Pearl's supervision
19 maintained comparable or greater at-large caseloads at the same time, including cases that were older
20 than those in Ms. Knallay's queue. Ms. Pearl herself had previously acknowledged this, stating that Ms.
21 Knallay was "not the only one" with a significant at-large caseload. Despite this, Ms. Knallay was the
22 only deputy disciplined.

23 48. The reprimand also distorted specific case facts to manufacture the appearance of performance
24 deficiencies. Among other mischaracterizations: (a) Ms. Knallay was accused of failing to review a
25 complex, multi-hundred-page case, when in fact she had reviewed it, discussed it with Ms. Pearl, and
26 was instructed by Ms. Pearl not to file it pending further investigation—an instruction that necessarily
27 required the case to remain in her queue; (b) Ms. Knallay was accused of failing to subpoena a
28 cooperative out-of-state witness, when in fact office practice and prior instruction provided that

1 cooperative out-of-state witnesses need not be subpoenaed, and Ms. Knallay had documented the
2 witness's availability and communicated this to Ms. Pearl; and (c) the reprimand referenced alleged
3 deficiencies in trial preparation without identifying specific cases or facts, making meaningful response
4 impossible.

5 49. The accusation of "insubordination" in the reprimand was predicated on no defined policy,
6 standard, or directive. No policy or guideline established what constituted a "timely" review of at-large
7 cases. The expectations cited in the reprimand were vague, shifting, and previously unenforced. This
8 retroactive application of an undefined standard—applied only to Ms. Knallay—underscores the
9 pretextual nature of the discipline.

10 50. The reprimand was issued on Ms. Knallay's final working day before her approved medical
11 leave, ensuring she had minimal opportunity to access records, gather documentation, or meaningfully
12 respond.

13 51. The Letter of Reprimand was irreconcilable with Ms. Knallay's documented performance
14 history. At the time it was issued, she had: (a) never been disciplined in nearly nine years of service; (b)
15 recently received a positive performance evaluation; (c) recently received a commendation and three-
16 step pay increase approved by the elected District Attorney; and (d) just been recognized as Prosecutor
17 of the Year for the 2024 calendar year. The abrupt shift from award-winning performance to formal
18 discipline—without any intervening corrective action, counseling, or progressive discipline—cannot be
19 explained by performance. It can only be explained by pretext.

20 **H. Constructive Discharge**

21 52. The cumulative effect of Defendants' conduct was devastating. Ms. Knallay's professional
22 reputation had been systematically undermined, her specialized work had been stripped from her
23 caseload, her disability-related conduct had been weaponized as a performance issue, and formal
24 discipline had been issued three days after she requested protected medical leave.

25 53. The environment became one in which Ms. Knallay could not perform her duties without fear
26 that her medically necessary conduct—something outside her control—would be used against her.
27 Despite having done everything right, and despite the County's own recognition of her as a top
28

1 performer, she was treated not as an asset but as a liability. She was left with no reasonable alternative
2 but to resign.

3 54. Ms. Knallay submitted her resignation on January 7, 2026. In it, she stated plainly: "The reason
4 for my resignation is unfair, biased, and discriminatory conduct by my direct supervisor based on my
5 medical conditions." Despite this explicit written notice of discrimination and retaliation, the County
6 took no meaningful action to remedy the situation or retain Ms. Knallay. Ms. Knallay's resignation was
7 not voluntary—it was the direct and foreseeable result of Defendants' unlawful conduct. It constituted a
8 constructive discharge.

9 **I. Post- Resignation Retaliatory Conduct**

10 55. The retaliatory conduct did not end upon Ms. Knallay's resignation. On January 12, 2026, while
11 Ms. Knallay remained on protected medical leave, ADA Russell texted her twice seeking information
12 about her cases. On January 14, 2026, he sent her a formal letter on District Attorney letterhead seeking
13 broad categories of case materials, including recorded witness interviews—all while she was still on
14 medical leave.

15 56. On January 16, 2026, Ms. Knallay responded promptly and professionally. She explained that
16 she could not address the request while on leave, asked that it be narrowed to specific identifiable cases
17 so she could respond accurately, and offered to come into the office on January 17, 2026—the day after
18 her leave ended—to return her equipment and address legitimate concerns. The District Attorney's
19 Office did not respond.

20 57. On January 19, 2026, Ms. Knallay discovered a letter at her personal home address bearing the
21 name of District Attorney Cynthia J. Zimmer, containing the same demands previously made by ADA
22 Russell. Around the same time, the U.S. Postal Service attempted certified delivery of additional
23 correspondence from the DA's Office to her residence.

24 58. Once Ms. Knallay retained counsel, the County produced a list of relevant cases within 24
25 hours—demonstrating that the information had been readily available all along. The failure to provide
26 that list when Ms. Knallay first requested it and offered to cooperate, while simultaneously escalating
27 written demands to her personal residence, confirms that the purpose was not to resolve legitimate case
28 transition issues, but to create the appearance of wrongdoing and to pressure and discredit Ms. Knallay.

1 59. After conducting an exhaustive review of all of her devices and files, Ms. Knallay confirmed
2 that she did not possess a single item of discovery that the District Attorney's Office had implied she
3 was withholding. Not one.

4 **CAUSES OF ACTION**

5 **FIRST CAUSE OF ACTION**

6 **Disability Discrimination in Violation of FEHA**

7 (Government Code § 12940(a))

8 **(As to All Defendants and Doe Defendants)**

9 60. Plaintiff realleges and incorporates by reference each and every allegation set forth above as
10 though fully set forth herein.

11 61. At all relevant times, Plaintiff was an employee within the meaning of Government Code section
12 12940 and Defendants were employers within the meaning of that statute.

13 62. Plaintiff suffers from chronic migraines and thyroid cancer, each of which constitutes a physical
14 disability within the meaning of Government Code section 12926 because each limits a major life
15 activity.

16 63. Defendants knew of Plaintiff's disabilities throughout her employment. Every supervisor
17 Plaintiff worked under was aware of her chronic migraine condition, and Defendants were notified of
18 her cancer diagnosis in June 2024.

19 64. Defendants discriminated against Plaintiff on account of her disability by, among other things:
20 (a) subjecting her to heightened scrutiny and adverse working conditions following her use of her
21 approved disability accommodation; (b) removing high-profile human trafficking cases from her
22 caseload; (c) portraying her disability-related conduct as performance deficiencies; (d) issuing a
23 pretextual Letter of Reprimand three days after she provided notice of medical leave; and (e) creating
24 conditions so intolerable as to compel her constructive discharge.

25 65. But for Plaintiff's disability, Defendants would not have taken the above-described adverse
26 employment actions.

27 66. As a direct and proximate result of Defendants' conduct, Plaintiff has suffered and continues to
28 suffer economic damages, including past and future loss of earnings and benefits, as well as non-

1 economic damages including severe emotional distress, anxiety, humiliation, and damage to her
2 professional reputation, all in an amount to be proven at trial.

3 67. Defendants' conduct was intentional, malicious, oppressive, and undertaken with conscious
4 disregard for Plaintiff's rights, entitling Plaintiff to an award of punitive damages against the individual
5 defendants in an amount to be determined at trial.

6 **SECOND CAUSE OF ACTION**

7 **Retaliation for Exercising FEHA Rights**

8 **(Government Code § 12940(h))**

9 **(As to All Defendants and Doe Defendants)**

10 68. Plaintiff realleges and incorporates by reference each and every allegation set forth above as
11 though fully set forth herein.

12 69. Government Code section 12940(h) prohibits an employer from retaliating against any person
13 for requesting a reasonable accommodation, utilizing a reasonable accommodation, or engaging in any
14 other protected activity under FEHA.

15 70. Plaintiff engaged in protected activity by, among other things: (a) requesting a reasonable
16 accommodation for her disability; (b) utilizing the approved accommodation for her migraines; (c)
17 requesting an interactive process; (d) providing medical documentation; and (e) notifying her employer
18 of the need for medical leave.

19 71. Defendants subjected Plaintiff to adverse employment actions because of her protected activity,
20 including: (a) increased and targeted scrutiny of her work immediately following her use of the approved
21 accommodation on November 17, 2025; (b) the issuance of a pretextual Letter of Reprimand three days
22 after she provided notice of medical leave on December 2, 2025; (c) the removal of high-profile cases
23 from her caseload; and (d) the post-resignation escalation of demands directed to her personal residence.

24 72. There exists a causal nexus between Plaintiff's protected activity and the adverse employment
25 actions taken by Defendants, including without limitation the close temporal proximity between
26 Plaintiff's use of her approved accommodation and the November 17, 2025 retaliatory email, and the
27 three-day gap between Plaintiff's December 2, 2025 notice of medical leave and the issuance of her first-
28 ever Letter of Reprimand.

1 73. As a direct and proximate result of Defendants' retaliation, Plaintiff has suffered economic and
2 non-economic damages in an amount to be proven at trial. Plaintiff is also entitled to an award of punitive
3 damages against the individual defendants.

4 **THIRD CAUSE OF ACTION**

5 **Retaliation for Taking Protected Medical Leave**

6 **(California Family Rights Act, Government Code § 12945.2;**

7 **Family and Medical Leave Act, 29 U.S.C. § 2615)**

8 **(As to All Defendants and Doe Defendants)**

9 74. Plaintiff realleges and incorporates by reference each and every allegation set forth above as
10 though fully set forth herein.

11 75. At all relevant times, Plaintiff was eligible for leave under the California Family Rights Act
12 ("CFRA") and the Family and Medical Leave Act ("FMLA"), and Defendants were covered employers
13 under both statutes.

14 76. Plaintiff exercised her right to take protected medical leave, including the leave she requested on
15 December 2, 2025, arising from her serious health condition.

16 77. Defendants retaliated against Plaintiff for exercising her CFRA and FMLA rights by, among
17 other things, issuing a pretextual Letter of Reprimand just three days after she provided notice of her
18 need for protected leave, and by continuing to make escalating demands upon her while she was on
19 protected leave.

20 78. As a direct and proximate result of Defendants' retaliation, Plaintiff has suffered economic and
21 non-economic damages in an amount to be proven at trial.

22 **FOURTH CAUSE OF ACTION**

23 **Failure to Provide Reasonable Accommodation**

24 **(Government Code § 12940(m))**

25 **(As to Defendants County of Kern and Kern County District Attorney's Office)**

26 79. Plaintiff realleges and incorporates by reference each and every allegation set forth above as
27 though fully set forth herein.

28 **///**

1 80. Government Code section 12940(m) requires employers to make reasonable accommodation for
2 the known physical disability of an employee unless the employer can demonstrate that the
3 accommodation would produce undue hardship.

4 81. Plaintiff requested and received an initial reasonable accommodation: the ability to rest briefly
5 in a dark room during a migraine episode and then return to work. However, rather than fully
6 implementing and maintaining this accommodation in good faith, Defendants weaponized Plaintiff's use
7 of the accommodation as a basis for false performance allegations, failed to conduct the required follow-
8 up review, and left the interactive process open-ended as a tool of continued scrutiny.

9 82. Defendants' failure to fully and in good faith implement and maintain the accommodation—and
10 their use of its exercise as a basis for adverse employment action—constitutes a failure to provide
11 reasonable accommodation in violation of Government Code section 12940(m).

12 83. As a direct and proximate result of Defendants' failure, Plaintiff has suffered economic and non-
13 economic damages in an amount to be proven at trial.

14 **FIFTH CAUSE OF ACTION**

15 **Failure to Engage in the Interactive Process**

16 **(Government Code § 12940(n))**

17 **(As to Defendants County of Kern and Kern County District Attorney's Office)**

18 84. Plaintiff realleges and incorporates by reference each and every allegation set forth above as
19 though fully set forth herein.

20 85. Government Code section 12940(n) requires an employer, upon receiving a request for
21 accommodation, to engage in a timely, good-faith interactive process with the employee to determine
22 effective reasonable accommodations.

23 86. While Defendants initiated an interactive process, they failed to complete it in good faith. The
24 required follow-up review of the implemented accommodation was never conducted. The process was
25 left open-ended, not as a vehicle for ensuring an effective accommodation, but as a means of continued
26 monitoring and surveillance of Plaintiff's disability-related conduct.

27 87. As a direct and proximate result of Defendants' failure, Plaintiff has suffered economic and non-
28 economic damages in an amount to be proven at trial.

1 **SIXTH CAUSE OF ACTION**

2 **Failure to Prevent Discrimination and Retaliation**

3 **(Government Code § 12940(k))**

4 **(Against Defendants County of Kern and Kern County District Attorney's Office)**

5 88. Plaintiff realleges and incorporates by reference each and every allegation set forth above as
6 though fully set forth herein.

7 89. Government Code section 12940(k) requires employers to take all reasonable steps necessary to
8 prevent discrimination and retaliation from occurring.

9 90. Defendants failed to take reasonable steps to prevent the discrimination and retaliation directed
10 at Plaintiff. Despite Plaintiff's explicit written notice in her resignation letter that she was leaving due to
11 "unfair, biased, and discriminatory conduct by my direct supervisor based on my medical conditions,"
12 Defendants took no meaningful action to investigate, remedy, or prevent the ongoing discrimination and
13 retaliation.

14 91. As a direct and proximate result of Defendants' failure, Plaintiff has suffered economic and non-
15 economic damages in an amount to be proven at trial.

16 **SEVENTH CAUSE OF ACTION**

17 **Harassment Based on Disability**

18 **(Government Code § 12940(j))**

19 **(As to All Defendants and Doe Defendants)**

20 92. Plaintiff realleges and incorporates by reference each and every allegation set forth above as
21 though fully set forth herein.

22 93. Government Code section 12940(j) prohibits harassment of an employee on account of physical
23 disability.

24 94. Defendant Gina Pearl, as Plaintiff's direct supervisor, subjected Plaintiff to a severe and
25 pervasive pattern of disability-based harassment, including without limitation: (a) targeting Plaintiff's
26 medical condition for scrutiny immediately upon assuming supervisory authority; (b) portraying
27 disability-related conduct to Human Resources as a performance problem while acknowledging to
28 Plaintiff that the process was not disciplinary; (c) stripping Plaintiff of her specialized human trafficking

caseload; (d) monitoring and exploiting Plaintiff's use of her approved accommodation; (e) singling Plaintiff out with escalating directives in direct response to her use of that accommodation; and (f) issuing a pretextual Letter of Reprimand calculated to humiliate and discredit Plaintiff on her final working day before protected leave.

95. This conduct was sufficiently severe and pervasive to alter the terms and conditions of Plaintiff's employment and to create a hostile work environment based on her disability.

96. Defendants County of Kern and Kern County District Attorney's Office knew or should have known of the harassment and failed to take immediate and appropriate corrective action.

97. As a direct and proximate result of the harassment, Plaintiff has suffered economic and non-economic damages in an amount to be proven at trial. Plaintiff is also entitled to an award of punitive damages against the individual defendants.

EIGHTH CAUSE OF ACTION

Constructive Discharge in Violation of Public Policy

(Tameny v. Atlantic Richfield Co. (1980) 27 Cal.3d 167)

(As to All Defendants and Doe Defendants)

98. Plaintiff realleges and incorporates by reference each and every allegation set forth above as though fully set forth herein.

99. Defendants intentionally created or knowingly permitted working conditions so intolerable that a reasonable person in Plaintiff's position would have had no reasonable alternative but to resign. These conditions included sustained disability discrimination, retaliation for exercising protected rights, a hostile work environment based on disability, the issuance of a pretextual and humiliating Letter of Reprimand issued on the eve of protected medical leave, and the absence of any meaningful remedial action despite explicit notice of discriminatory conduct.

100. Plaintiff's resignation on January 7, 2026 was the direct and foreseeable result of Defendants' unlawful conduct and constitutes a constructive discharge in violation of the fundamental public policies of the State of California, including those embodied in FEHA (Gov. Code §§ 12900 et seq.), CFRA (Gov. Code § 12945.2), and Article I of the California Constitution.

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1 101. As a direct and proximate result of her constructive discharge, Plaintiff has suffered economic
2 and non-economic damages in an amount to be proven at trial. Plaintiff is also entitled to an award of
3 punitive damages against the individual defendants.

4 **NINTH CAUSE OF ACTION**

5 **Negligent Supervision**

6 **(Against Defendants County of Kern and Kern County District Attorney's Office)**

7 102. Plaintiff realleges and incorporates by reference each and every allegation set forth above as
8 though fully set forth herein.

9 103. Defendants County of Kern and Kern County District Attorney's Office owed a duty to Plaintiff
10 to exercise reasonable care in the supervision of their supervisory employees, including Defendant Gina
11 Pearl and Defendant Kenneth Russell, and to prevent those employees from engaging in conduct that
12 would cause injury to Plaintiff.

13 104. Defendants breached this duty by, among other things, failing to adequately supervise and
14 monitor Defendant Pearl's conduct toward Plaintiff, failing to investigate or act upon Plaintiff's explicit
15 written notice that she was resigning due to discriminatory conduct by her supervisor, and failing to take
16 corrective action despite knowledge of the ongoing discriminatory treatment.

17 105. As a direct and proximate result of Defendants' negligent supervision, Plaintiff has suffered
18 economic and non-economic damages in an amount to be proven at trial.

19 **PRAYER FOR RELIEF**

20 **WHEREFORE**, Plaintiff JANA E KNALLAY prays for judgment against Defendants, and
21 each of them, as follows:

- 22 1. For compensatory damages, including past and future loss of earnings, benefits, and
23 earning capacity, in an amount to be proven at trial;
- 24 2. For general non-economic damages, including damages for emotional distress, anxiety,
25 humiliation, and loss of professional reputation, in an amount to be proven at trial;
- 26 3. For punitive damages against the individual defendants in an amount sufficient to deter
27 and make an example of them;

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- 1 4. For reasonable attorneys' fees and costs of suit pursuant to Government Code section
2 12965 and other applicable law;
3 5. For pre-judgment and post-judgment interest at the maximum lawful rate;
4 6. For declaratory and injunctive relief as the Court may deem appropriate; and
5 7. For such other and further relief as the Court deems just and proper.

6 **DEMAND FOR JURY TRIAL**

7 Plaintiff JANA E KNALLAY hereby demands a trial by jury on all issues so triable.

8
9 DATED: July 1, 2026

ANTONYAN MIRANDA, LLP

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11 By: E. Arutunian
12 Emilia A. Arutunian, Esq.
13 Attorney for Plaintiff
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EXHIBIT A

CRD COMPLAINT

**COMPLAINT OF EMPLOYMENT DISCRIMINATION
BEFORE THE STATE OF CALIFORNIA
Civil Rights Department
Under the California Fair Employment and Housing Act
(Gov. Code, § 12900 et seq.)**

In the Matter of the Complaint of

Janae Knallay

CRD No. 202607-35970801

Complainant,

vs.

County of Kern

,

County of Kern, Office of the District Attorney

,

Kenneth Russell

,

Gina Pearl

,

Cynthia Zimmer

,

Respondents

1. Respondent **County of Kern** is an **employer** subject to suit under the California Fair Employment and Housing Act (FEHA) (Gov. Code, § 12900 et seq.).

2. Complainant is naming **County of Kern, Office of the District Attorney** business as Co-Respondent(s).

Complainant is naming **Kenneth Russell** individual as Co-Respondent(s).

Complainant is naming **Gina Pearl** individual as Co-Respondent(s).

Complainant is naming **Cynthia Zimmer** individual as Co-Respondent(s).

3. Complainant **Janae Knallay**, resides in the City of **Escondido**, State of .

4. Complainant alleges that on or about **January 7, 2026**, respondent took the following adverse actions:

1 **Complainant was harassed** because of complainant's medical condition (cancer or genetic
2 health/psychiatric).

3 **Complainant was discriminated against** because of complainant's medical condition
4 (cancer or genetic characteristic), disability (physical, intellectual/developmental, mental
5 health/psychiatric), family care and medical leave (cfra) related to serious health condition of
6 employee or family member, child bonding, or military exigencies and as a result of the
7 discrimination was forced to quit, reprimanded, asked impermissible non-job-related
8 questions, other, denied accommodation for a disability, denied employer paid health care
9 while on pregnancy disability leave (pdl).

10 **Complainant experienced retaliation** because complainant reported or resisted any form
11 of discrimination or harassment, requested or used a disability-related accommodation,
12 participated as a witness in a discrimination or harassment complaint, requested or used
13 family care and medical leave (cfra) related to serious health condition of employee or family
14 member, child bonding, or military exigencies and as a result was forced to quit,
15 reprimanded, asked impermissible non-job-related questions, denied any employment
16 benefit or privilege, other, denied work opportunities or assignments, denied
17 accommodation for a disability.

18 **Additional Complaint Details:** Janae Knallay began her employment on April 3, 2017 as a
19 Deputy District Attorney at the Kern County District Attorney's Office. Through years of
20 exceptional work, she rose to the position of Deputy District Attorney IV. From the beginning,
21 Ms. Knallay was transparent about her chronic migraine condition. Every supervisor she
22 worked under was aware of it and for more than seven years, that condition was never
23 treated as a limitation or a problem.

24 Ms. Knallay handled some of the most serious and emotionally demanding cases in the
25 office, including human trafficking prosecutions and cases involving vulnerable victims. She
26 worked weekends, sacrificed her personal well-being, and consistently ensured victims
27 received justice. Her personnel file reflects uninterrupted positive performance reviews,
28 commendations, and promotions. In nearly nine years of service, she was never disciplined,
until she became ill with cancer.

In June 2024, Ms. Knallay was diagnosed with thyroid cancer. Despite the gravity of that
diagnosis, she continued to work. During the period between her diagnosis and surgery, she
handled multiple back-to-back jury trials, including complex human trafficking cases, while
undergoing testing and managing her symptoms.

1 Shortly after undergoing surgery, the County recognized her contribution by awarding her
2 Prosecutor of the Year, acknowledging she was one of the most effective and respected
3 prosecutors in the office. District Attorney Cythnia Zimmer publicly recognized her
4 contributions at the time of the award.

5 Following her surgery, Ms. Knallay took approximately three months of medical leave. When
6 she returned in March 2025, she immediately resumed her full duties. She received a
7 positive performance evaluation in April 2025.

8 On April 28, 2025, Gina Pearl became Ms. Knallay's direct supervisor. This marked a turning
9 point in her employment. For the first time in her career, Ms. Knallay was asked to provide
10 medical documentation for her migraines. Ms. Pearl initiated an interactive process meeting,
11 not because of any performance deficiency and assured Ms. Knallay that the process was
12 not disciplinary.

13 At the same time, Ms. Pearl began portraying Ms. Knallay's medically related conduct as
14 problematic to Human Resources, suggesting her absences required additional staffing. Ms.
15 Pearl acknowledged the conduct was tied to a medical condition yet simultaneously
16 characterized that same conduct as a performance problem.

17 Ms. Knallay was widely recognized, both within the Kern County DA's Office and among law
18 enforcement agencies statewide, as the office's human trafficking expert. Shortly after Ms.
19 Pearl assumed supervisory authority, a high-profile human trafficking case arose. Law
20 enforcement detectives from Sacramento and the Bakersfield Police Department alerted Ms.
21 Knallay, consistent with longstanding practice.

22 Ms. Pearl responded by questioning how Ms. Knallay learned of the case, contacted
23 Bakersfield Police Department leadership to complain about the routing, and refused to
24 assign the case to Ms. Knallay, claiming it "had to be handled by a supervisor."
25 Approximately one month later, Ms. Pearl reassigned that same case to a deputy district
26 attorney with no specialized human trafficking experience.

27 This pattern reflects a deliberate effort by Ms. Pearl to diminish Ms. Knallay's role, remove
28 high-profile opportunities, and undermine the professional credibility she had spent years
developing.

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3 Ms. Knallay requested and received a reasonable accommodation to manage her
4 migraines: resting briefly in a dark room and then returning to work. This accommodation
5 was approved and effective. Ms. Knallay completed 75 days in jury trial between March and
6 December 2025 while utilizing this accommodation.

7
8 Rather than treating the accommodation as a solution, Ms. Pearl monitored Ms. Knallay's
9 use of it and later incorporated it into a narrative that she was not meeting expectations. The
10 required follow-up review was never conducted, leaving the process open-ended to allow
11 continued tracking of Ms. Knallay's condition. The very conduct Ms. Pearl knew was
12 medically driven was weaponized as a performance issue.

13
14 Between November 13 and November 17, 2025, Ms. Knallay experienced multiple
15 migraines and appropriately notified Ms. Pearl each time she utilized her approved
16 accommodation. Ms. Pearl was fully aware that these episodes were medically driven, she
17 had documentation, had initiated the interactive process, and had approved the
18 accommodation.

19 On November 17, 2025, immediately after Ms. Knallay invoked her accommodation, Ms.
20 Pearl sent an individualized email directing her to prioritize her at-large caseload. This was
21 the first time Ms. Knallay had ever been singled out in this manner. From that moment
22 forward, the same conduct that had been accepted for years was treated as evidence of
23 neglect.

24 On December 2, 2025, Ms Knallay notified the County that she would be taking medical
25 leave. Just three days later, on December 5, 2025, Ms. Knallay received her first ever Letter
26 of Reprimand.

27 The reprimand relied heavily on allegations regarding Ms. Knallay's at-large caseload.
28 These allegations are contradicted by objective facts: after being directed to prioritize her at-
large cases on November 17, 2025, Ms. Knallay reduced her caseload from 24 to 12 cases
within approximately two weeks, while simultaneously engaged in jury trial and handling
complex matters involving hundreds of pages of material.

1
2 Other deputies under Ms. Pearl's supervision had similar or greater at-large caseloads. Ms.
3 Pearl acknowledged that Ms. Knallay was "not the only one" with a significant at-large
4 caseload. Despite this, Ms. Knallay was the only deputy disciplined. Ms. Knallay's discipline
5 came just three days after providing notice of medical leave.

6 The reprimand also distorted specific facts. Ms. Knallay was criticized for failing to review a
7 complex multi-hundred-page case. Ms. Knallay had reviewed said case, discussed it with
8 Ms. Pearl, and was instructed not to file pending further investigation. Ms. Knallay was
9 further criticized for failing to subpoena a cooperative out-of-state witness. This practice was
10 consistent with office policy and prior instruction. The "insubordination" allegation was based
11 on no defined policy or standard, selectively applied only to Ms. Knallay.

12 The reprimand was provided on December 5, 2025, Ms. Knallay's final working day before
13 approved medical leave. This gave her minimal opportunity to access records or
14 meaningfully respond. The timing was designed to ensure maximum impact with minimal
15 ability to defend herself.

16 At the time the reprimand was issued, Ms. Knallay had:

17 never been disciplined in nearly nine years of service;

18 recently received a positive performance evaluation;

19 recently received a commendation and three-step pay increase from the elected District
20 Attorney; and

21 just been recognized as Prosecutor of the Year.

22 The abrupt shift from award-winning performance to formal discipline, without any
23 intervening corrective action, counseling, or progressive discipline, cannot be explained by
24 performance. It can only be explained by pretext.

1 Faced with a damaged reputation, ongoing disability-based scrutiny, and the absence of any
2 meaningful corrective action by the County, Ms. Knallay was left with no reasonable
3 alternative but to resign. Her resignation, submitted on January 7, 2026, stated plainly: "The
4 reason for my resignation is unfair, biased, and discriminatory conduct by my direct
5 supervisor based on my medical conditions."
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1 VERIFICATION

2 I, **Emilia Arutunian**, am the **Attorney** in the above-entitled complaint. I have read
3 the foregoing complaint and know the contents thereof. The matters alleged are based
4 on information and belief, which I believe to be true. The matters alleged are based
on information and belief, which I believe to be true.

5 On July 1, 2026, I declare under penalty of perjury under the laws of the State of
6 California that the foregoing is true and correct.

7 **San Diego, California**

 SUPERIOR COURT OF CALIFORNIA COUNTY OF KERN Bakersfield Metropolitan Justice 1215 Truxtun Ave Bakersfield, CA 93301 Phone: (661) 610-6000	FOR COURT USE ONLY FILED SUPERIOR COURT OF CALIFORNIA COUNTY OF KERN July 14, 2026 /s/ Javen Silva, Deputy Clerk
Janae Knallay v. County of Kern, a public entity, et al	Case Number: 26CUB02678
Notice of Assignment to Judicial Officer for All Purposes, Notice of Order to Show Cause Re: California Rules of Court, Rule 3.110, and Notice of Case Management Conference	

By order of the presiding judge, the above-entitled case is assigned to the Honorable T. Mark Smith for all purposes. It will be managed in Department/Division T-2 until its conclusion. Peremptory challenges, if any, must be made within the times set out in Code of Civil Procedure §170.6.

To Plaintiff(s) and Plaintiff(s) Counsel:

You are required to serve this Notice of Assignment and Notice of Order to Show Cause date and Notice of Case Management Conference date with the Summons, Complaint [Local Rule 3.7(a), Alternative Dispute Resolution (ADR) Information Packet, and ADR Stipulation and Order Form (California Rules of Court, Rule 3.221).

You are ordered to appear on October 26, 2026 at 8:30 A.M. in Bakersfield Traffic Courtroom 2 at 3131 Arrow St, Bakersfield, CA 93308 to give any legal reason why sanctions shall not be imposed for failure to serve the complaint on all named defendants and file proof(s) of service with the court within sixty (60) days after the filing of the complaint pursuant to California Rules of Court, Rule 3.110. All appearances are mandatory, unless the court receives the required proof(s) of service five (5) court days prior to the hearing date, and then no appearance is necessary.

To each party and their respective attorney(s) of record:

Your attention is directed to the California Rules of Court and the Code of Civil Procedure provisions regarding mandatory expedited jury trial procedures, specifically to California Rules of Court Rules 3.1546, et seq., and Code of Civil Procedure section 630.20, et seq.

This case is set for Case Management Conference on January 11, 2027 at 8:30 A.M. in Bakersfield Traffic Courtroom 2 located at 3131 Arrow St, Bakersfield, CA 93308. Parties shall comply with and file case management statements at least fifteen (15) days prior to the conference in accordance with California Rules of Court, Rules 3.720 – 3.730.

To Cross Complainant(s) and Cross Complainant(s) Counsel:

If you are bringing cross complaint against new parties, you are, likewise, required to serve this Notice of Assignment pursuant to California Rules of Court, Rule 3.110, Notice of Order to Show Cause date and Notice of Case Management Conference date on the new cross defendants.

Tara Leal
Clerk of the Superior Court

Date: July 14, 2026

By: /s/ Javen Silva
Javen Silva, Deputy Clerk

The Clerk of the Superior Court's office has received a civil complaint from you for filing. Pursuant to the Trial Court Delay Reduction Act, your case has been assigned to the Honorable T. Mark Smith as monitoring judge.

Judge T. Mark Smith has instituted a direct calendaring system for all cases assigned to him/her as the monitoring judge.

All law and motion, case management and trial setting conferences, ex parte matters and trials will be scheduled before him/her in Bakersfield Traffic Courtroom 2 at 3131 Arrow St, Bakersfield, CA 93308.

Law & Motion and Ex-Parte hearing dates must be pre-cleared by contacting the Direct Calendaring Clerk at 661-610-6460. Tentative rulings are not provided in advance of the hearing.

At the time of filing the complaint, plaintiff's counsel will be given a Notice of Case Management Conference which sets a conference approximately one hundred eighty (180) days after filing of the complaint. This notice must be served with the summons and complaint on all defendants. Defendants must serve the notice on all cross-defendants named. The notice must also be served on interveners and lien claimants.

Pursuant to Local Rule 3.2.1. a party wishing to appear remotely in any civil proceeding other than an evidentiary hearing or trial, including conferences and law and motion hearings, is permitted to appear without advance notice to the court or other parties. By appearing remotely those persons will be deemed to have requested a remote appearance. Instructions for accessing Remote Court Hearings can be found on the court's website. Each judicial officer retains the discretion to require a party to appear in person at a conference, hearing, or proceeding, as authorized by Code of Civil Procedure section 367.75. Remote proceedings for evidentiary hearings or trials in all divisions shall be noticed and conducted as authorized by Code of Civil Procedure section 367.75 and California Rules of Court, rule 3.672.

The Court does not provide court reporters for civil matters. Parties wishing to have a matter reported must provide their own reporter. The court maintains a list of pre-approved official reporters pro tem. Your preferred reporter can be added to this list. Information regarding the court's list is on the court's website.

Another judge will hear settlement conferences in cases assigned to Judge T. Mark Smith. However, those cases that do not settle will be set for trial before him/her.

At least fifteen (15) days prior to the case management conference, each party shall prepare, file and serve on each other party a case management conference statement providing the Court with the following information:

1. The “at-issue” status of the case including any new parties that may be contemplated;
2. A brief statement of the type of case and the general facts or contentions;
3. A description of the discovery done to date and that contemplated to be done;
4. Estimated time for trial and whether a jury is demanded;
5. Whether or not the case is entitled to priority in trial setting and if so, the legal authority thereof;
6. An evaluation of the case for alternative dispute resolution, including arbitration (judicial or binding), mediation or private judge handling;
7. If a person injury action, a description of the injuries sustained by each plaintiff and the elements of claimed damage;
8. A statement of any settlement negotiations undertaken thus far;
9. The name of the attorney primary responsible for the case on behalf of the party filing the statement.

More than one party may join in the filing of a single statement.

The case management conference shall be attended by the attorney primarily responsible for the case on behalf of each party or a member of his or her firm or counsel formally associated in the case. The attorney attending shall be thoroughly familiar with the case, and be able to engage in meaningful discussions with court and counsel, and to enter into agreements on behalf of his or her client on the following subjects:

1. The “at-issue” status of the case including the dismissal of the unnamed doe defendants or cross-defendants by agreement of all parties;
2. Discovery conducted and remaining to be done;
3. Amenability of the case to alternative dispute resolution including, but no limited to, arbitration (judicial or binding), mediation, and private judge handling.
4. Delineation of issues including stipulation of facts not in substantial controversy;
5. Settlement prospects;
6. Setting the matter for trial, pre-trial conferences, settlement conference or further case management conference;
7. Any other matters relevant to the processing of the case to a final resolution.

Any violation of these rules shall result in the imposition of substantial sanctions which may include monetary, issue, termination, or other appropriate sanctions.

Certificate of Service

The undersigned, of said Kern County, certify: That I am a Deputy Clerk of the Superior Court of the State of California, in and for the County of Kern, that I am a citizen of the United States, over 18 years of age, I reside in or am employed in the County of Kern, that I am not a party to the within action and that my business address is 1215 Truxtun Ave, Bakersfield, CA 93301, that I served the Notice of Assignment to Judicial Officer for All Purposes, Notice of Order to Show Cause Re: California Rules of Court, Rule 3.110, and Notice of Case Management Conference attached hereto on all interested parties and any respective counsel of record in the within action, following standard Court practices, by: (a) enclosing true copies thereof in a sealed envelope(s) with postage fully prepaid and depositing/placing for collection and delivery in the United States mail at Bakersfield, California; and/or (b) enclosing true copies thereof in a Kern County interoffice envelope(s) and placing for collection and delivery; and/or (c) electronically transmitting true copies thereof by electronic service or e-mail. Service address(es) are indicated on the attached service list.

Date of service: July 14, 2026

Place of service: Bakersfield, California

Sent from electronic service address: donotreply@kern.courts.ca.gov

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Tara Leal
Clerk of the Superior Court

Date: July 14, 2026

By: /s/ Javen Silva
Javen Silva, Deputy Clerk

Service List

Emilia Arutunian
402 W Broadway Fl. 21
San Diego, CA 92101
Emilia@antonyanmiranda.com

SUPERIOR COURT OF CALIFORNIA, COUNTY OF KERN
ALTERNATIVE DISPUTE RESOLUTION (ADR)
INFORMATION PACKET



Kern County Superior Court encourages, and under certain circumstances, may require parties to try ADR before trial. Courts have also found ADR to be beneficial when used early in the case process. The courts, community organizations and private providers offer a variety of ADR processes to help people resolve disputes without a trial. Below is information about the potential advantages and disadvantages of ADR, the most common types of ADR, and how to find a local arbitrator, mediator or neutral evaluator. You may find more information about these ADR processes at www.courts.ca.gov/programs/adr.

Possible Advantages and Disadvantages of ADR

ADR may have a variety of advantages or disadvantages over a trial depending on the type of ADR process used as well as the particular type of case involved.

Possible Advantages: Saves time; saves money; gives the parties more control over the dispute resolution process and outcome; helps to preserve and/or improve party relationships.

Possible Disadvantages: May add additional time and costs to the litigation if ADR does not resolve the dispute; procedures such as discovery, jury trial, appeals, and other legal protections may be limited or unavailable.

Most Common Types of ADR

Mediation: A neutral person or "mediator" helps the parties communicate in an effective and constructive manner so the parties can try to resolve their dispute. The mediator does not decide the outcome, but helps the parties to do so. Mediation is generally confidential and may be particularly useful where ongoing relationships are involved, such as between family members, neighbors, employers/employees or business partners.

Settlement Conferences: A judge or another neutral person assigned by the court helps the parties to understand the strengths and weaknesses of their case and to discuss settlement. The judge or settlement conference neutral does not make a decision in the case but helps the parties to negotiate a settlement. Settlement conferences may be particularly helpful when the parties have very different views about the likely outcome of a trial in their case.

Neutral Evaluation: The parties briefly and informally present their facts and arguments to a neutral person who is often an expert in the subject matter of the dispute. The neutral does not decide the outcome of the dispute, but helps the parties to do so by providing them with a non-binding opinion about the strengths, weaknesses and likely outcome of their case. Depending on the neutral evaluation process, and with the parties' consent, the neutral may then help the parties try to negotiate a settlement. Neutral evaluation may be appropriate when the parties desire a neutral's opinion about how the case might be resolved at trial; and, if the primary dispute is about the amount of damages or technical issues, the parties would like a neutral expert to resolve those disputes.

Arbitration: The parties present evidence and arguments to a neutral person or “arbitrator” who then decides the outcome of the dispute. Arbitration is less formal than a trial, and the rules of evidence are generally more relaxed. If the parties agree to *binding* arbitration, they waive their right to a jury trial and agree to accept the arbitrator’s decision. With *nonbinding* arbitration, any party may reject the arbitrator’s decision and request a trial. Arbitration may be appropriate when the parties want another person to decide the outcome of their dispute but would like to avoid the formality, time and expense of a trial, or desire an expert in the subject matter of their dispute to make a decision.

Local Court ADR Programs

The Superior Court, County of Kern offers two types of ADR: Arbitration in cases in which the amount in controversy as to each plaintiff is \$50,000 or less; and DRPA mediation services on the day of the hearing, settlement conference or trial.

Arbitration: The Superior Court of California, County of Kern does use Arbitrators in civil cases where the amount in controversy as to each individual plaintiff is \$50,000 or less. The Court may order the parties to Arbitration or the parties may agree to Arbitration any time before the first case management conference statement is filed. See Local Rule 3.14 at https://www.kern.courts.ca.gov/system/files/local_rules_of_court.pdf

Dispute Resolution Program Act (DRPA): The Superior Court of California, County of Kern also offers mediation services in small claims and unlawful detainer, civil harassment, family law and probate matters. The Court has contracted with the Better Business Bureau (BBB) under the Dispute Resolution Programs Act (DRPA) to provide these mediation services. For more information about BBB Mediation Services go to <https://www.bbb.org/local-bbb/bbb-serving-central-california-and-inland-empire-counties>.

ADR Coordinator:

Although complaints about arbitrators and mediators are rare, the Superior Court of California, County of Kern does provide a complaint procedure in our Local Rules, Rule 3.14.7. If you have a complaint or a concern with any of this Court’s ADR programs, or simply have a question about ADR, please contact the ADR Administrator at ADRAdministrator@kern.courts.ca.gov or 661-868-5695.

Resources:

California Department of Consumer Affairs: https://www.dca.ca.gov/consumers/mediation_guides.shtml

Judicial Branch California Courts – ADR: www.courts.ca.gov/selfhelp-adr.htm

ADR Stipulation Form: https://www.kern.courts.ca.gov/system/files/adr_stipulation_and_order_form.pdf