

SUMMONS

(CITACION JUDICIAL)

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

ELECTRONICALLY FILED
Superior Court of California,
County of Kern

By: Javen Silva
Deputy Clerk

08/27/2026

NOTICE TO DEFENDANT: COUNTY OF KERN, a Public Entity;
(AVISO AL DEMANDADO): (Additional Parties Form is Attached).

YOU ARE BEING SUED BY PLAINTIFF: JANE ROE V.G., an individual.
(LO ESTÁ DEMANDANDO EL DEMANDANTE):

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

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

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case.

¡AVISO! Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

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

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos 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: Superior Court of California,
(El nombre y dirección de la corte es): County of Kern, Metropolitan Division
1215 Truxtun Ave., Bakersfield, CA 93301

CASE NUMBER:
(Número del Caso):

26CUB03340

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is: Alexandra Sagona, Esq.
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):
WEITZ & LUXENBERG, P.C., 1880 Century Park East, Suite 700, Los Angeles, CA 90067; (310) 247-0921

DATE: **08/27/2026** Clerk, by **Tara Leal** (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 416.60 (minor)
☐ CCP 416.20 (defunct corporation) ☐ CCP 416.70 (conservatee)
☐ CCP 416.40 (association or partnership) ☐ CCP 416.90 (authorized person)
☒ other (specify): **CCP 416.50 (Public Entity)**
4. ☒ by personal delivery on (date):

SHORT TITLE: V.G. V. COUNTY OF KERN, ET AL.	CASE NUMBER: 26CUB03340
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INSTRUCTIONS FOR USE

- This form may be used as an attachment to any summons if space does not permit the listing of all parties on the summons.
 → If this attachment is used, insert the following statement in the plaintiff or defendant box on the summons: "Additional Parties Attachment form is attached."

List additional parties (Check only one box. Use a separate page for each type of party.):

☐ Plaintiff ☒ Defendant ☐ Cross-Complainant ☐ Cross-Defendant

A. MIRIAM JAMISON CHILDREN'S CENTER FOUNDATION, a California Nonprofit Public Benefit Corporation; A. MIRIAM JAMISON CHILDREN'S CENTER, a Public Entity; DOE 1, an individual; and DOES 2-60, INCLUSIVE.

BY ORDER OF THE BD/SUPV
 Referred To County Counsel
36 pages
Delivered process server
 Copies Furnished Ris's Management

 Date 10.13.26
 Clerk of the Board of Supervisors
 By Michelle [Signature], Deputy

WEITZ & LUXENBERG, P.C.

Alexandra K. Sagona (State Bar No. 341450)

1880 Century Park East, Suite 700,

Los Angeles, CA 90067

Telephone: (310) 247-0921

ASagona@weitzlux.com

Attorney for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF KERN**

JANE ROE V.G., an individual,

Plaintiff,

vs.

COUNTY OF KERN, a Public Entity; A.
MIRIAM JAMISON CHILDREN'S CENTER
FOUNDATION, a California Nonprofit Public
Benefit Corporation; A. MIRIAM JAMISON
CHILDREN'S CENTER, a Public Entity; DOE
1, an individual; and DOES 2-60, INCLUSIVE,

Defendants.

Case No.: 26CUB03340

Judge:

Dept.:

COMPLAINT FOR DAMAGES:

1. **CHILDHOOD SEXUAL ABUSE**
2. **INTENTIONAL INFLICTION OF
EMOTIONAL DISTRESS**
3. **NEGLIGENCE**
4. **NEGLIGENT HIRING, TRAINING,
SUPERVISION, and RETENTION**
5. **FAILURE TO REPORT SUSPECTED
CHILD ABUSE**
6. **NEGLIGENT SUPERVISION OF A
MINOR**

[JURY TRIAL DEMANDED]

Plaintiff hereby complains and alleges as follows:

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NATURE OF THE ACTION

Based upon information and belief available to Plaintiff JANE ROE V.G. was a minor when she was sexually abused by Defendant DOE 1 (hereinafter "DOE 1" or "Perpetrator"), a co-habitant at the A. Miriam Jamison Children's Center, operated and controlled by Defendant County of Kern, California (hereinafter "COUNTY").

Upon information and belief, Plaintiff, by and through Plaintiff's attorney, makes the following allegations:

THE PARTIES

1. Plaintiff JANE ROE V.G., born on September 27, 1993, is a female adult who was a victim of childhood sexual abuse that occurred in the County of Kern. The sexual abuse occurred in or around 2009, while Plaintiff was a minor temporarily staying at COUNTY's emergency children's shelter, pending foster placement.
2. JANE ROE V.G. was a resident of Kern County, California and under the custody of COUNTY. This action is governed by Code of Civil Procedure §340.1 because JANE ROE V.G. is an adult who was a victim of childhood sexual assault. She endured sexual abuse while under the care, custody, control, supervision, and protection of COUNTY during her stay at JAMISON in approximately 2009.
3. Plaintiff JANE ROE V.G. is proceeding in this lawsuit as a real party in interest by using a pseudonym utilized to protect her privacy because she is a victim of childhood sexual assault as defined by Code of Civil Procedure § 340.1. Plaintiff is entitled to protect her identity in this public court filing by identifying herself as a real party in interest proceeding under a pseudonym. (See *Doe v. Lincoln Un. Sch. Dist.* (2010) 188 Cal.App.4th 758.)

- 1 4. DOE 1 is a former child who stayed at JAMISON in 2009, where she sexually abused
2 JANE ROE V.G. Since DOE 1 was a minor when she inflicted the sexual abuse, her
3 identity will be protected by proceeding under a pseudonym.
- 4 5. COUNTY is a public entity organized under the laws of the State of California. At all
5 relevant times, COUNTY, acting through its Human Services Department, was the
6 owner, manager, operator, supervisor, and controller of JAMISON, an emergency
7 children's shelter for minors waiting on foster placement, or for their parents to return,
8 after being removed from custody by COUNTY's Child Protective Services. COUNTY
9 was responsible for the care and safety of children within Kern County, including
10 Plaintiff and others staying at JAMISON.
- 11 6. Defendants A. MIRIAM JAMISON CHILDREN'S CENTER FOUNDATION, a
12 California Nonprofit Public Benefit Corporation, and A. MIRIAM JAMISON
13 CHILDREN'S CENTER, a Public Entity, are collectively referred to herein as
14 "JAMISON." At all relevant times, JAMISON provided temporary housing, care,
15 supervision, and protective services for minors taken into protective custody by
16 COUNTY. COUNTY exercised duties and responsibilities concerning the safety,
17 welfare, supervision, and care of minors at JAMISON.
- 18 7. Defendants DOES 2 through 60, inclusive, are individuals and/or business or corporate
19 entities incorporated in and/or doing business in California, whose true names and
20 capacities are unknown to Plaintiff, who therefore sue such Defendants by fictitious
21 names. Plaintiff will amend the Complaint to show the true names and capacities of
22 each such DOE Defendant when ascertained. Plaintiff is informed and believes and
23 thereon alleges that each Defendant designated herein as a DOE defendant is legally
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1 responsible in some manner for the events and happenings herein alleged and in such
2 manner proximately caused damages to Plaintiff as hereinafter alleged.

3 **JURISDICTION AND VENUE**

- 4 8. The Court has personal jurisdiction over Defendants pursuant to California Code of
5 Civil Procedure §410.10 because they are located in California, are doing business in
6 California, have committed acts or omissions in California with respect to one or more
7 causes of action arising from these acts or omissions, and/or have caused effects in
8 California with respect to one or more causes of action arising from these effects.
9
10 9. Venue is proper in Kern County in accordance with California Code of Civil Procedure
11 §§ 395 and 395.5 because one or more Defendants reside in or maintain their principal
12 places of business in Kern County, and the injuries to Plaintiff were sustained in Kern
13 County.
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15 10. Whenever reference is made to any Defendant entity, such reference includes that
16 entity, its parent companies, subsidiaries, affiliates, predecessors, and successors.
17 In addition, whenever reference is made to any act, deed, or transaction of any
18 entity, the allegation means that the entity engaged in the act, deed, or transaction
19 by or through its officers, directors, agents, employees, or representatives while they
20 were actively engaged in the management, direction, control, or transaction of the
21 entity's business or affairs.
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23 11. Plaintiff's lawsuit is timely pursuant to the provisions of Code of Civil Procedure section
24 340.1, as Plaintiff is below the age of 40.
25

26 **EXEMPTION FROM GOVERNMENT TORT CLAIMS ACT**

- 27
28 12. Government Code section 905(m) specifically exempts childhood sexual abuse cases from

1 the requirement of filing a government tort claim, as follows:

2 "There shall be presented in... all claims for money or damages against local public
3 entities except any of the following:

4 (m) Claims made pursuant to Section 340.1 of the Code of Civil Procedure
5 for the recovery of damages suffered as a result of childhood sexual assault."
6

7 As such, Plaintiff was not required to present a government tort claim to Defendants.

8 **GENERAL ALLEGATIONS APPLICABLE TO ALL COUNTS**

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10 13. At all times material, Plaintiff was an inhabitant at a COUNTY facility after being moved
11 there by COUNTY, and was under the direct care, custody, and supervision of COUNTY. By
12 virtue of Plaintiff's age and status, COUNTY had a special duty of care to protect Plaintiff
13 from known and foreseeable risks of harm.

14 14. Public employees have a duty of care and are statutorily liable for injury caused by their
15 act or omission to the same extent as a private person would be, as provided by
16 Government Code Section 820(a).
17

18 15. A special relationship existed at all relevant times between COUNTY, JAMISON, and
19 DOES 1 through 60, inclusive, and the minor residents, including Plaintiff. By accepting
20 custody of the minor Plaintiff, COUNTY established an *in loco parentis* relationship
21 with Plaintiff as caregiver-child and in so doing, owed Plaintiff a duty to protect Plaintiff
22 from injury.
23

24 16. California Government Code Section 815.6 states that "Where a public entity is under a
25 mandatory duty imposed by an enactment that is designed to protect against the risk of a
26 particular kind of injury, the public entity is liable for an injury of that kind proximately
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1 caused by its failure to discharge the duty unless the public entity establishes
2 that it exercised reasonable diligence to discharge the duty."

3 17. At all times relevant and material hereto, COUNTY and JAMISON were responsible
4 for providing for the care, protection, and safety of Plaintiff, who was under their care
5 and custody. COUNTY and JAMISON owed a duty to care for and protect Plaintiff, a
6 child under their custody and control in Kern County, and in that regard, assumed an
7 obligation of the highest order to ensure Plaintiff's safety. *See* Cal. Welf. and Inst.
8 Code § 16000.1(a).
9

10 18. At all times relevant and material hereto, COUNTY and JAMISON had a non-
11 delegable duty to use reasonable care in the placement, investigation, licensing,
12 supervision, oversight, and/or monitoring of foster care facilities, shelters, homes,
13 and/or families with whom they placed foster children, and to develop or implement
14 programs, guidelines, procedures and/or training to prevent the abuse of children taken
15 to these facilities. At all times relevant and material hereto, COUNTY owed a non-
16 delegable duty to Plaintiff to use reasonable care to protect the safety, care, well-being,
17 and health of Plaintiff while under the custody and care of COUNTY.
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19

20 19. At all times relevant and material hereto, COUNTY and JAMISON owed non-
21 delegable duties to children under their protective custody, like Plaintiff, including,
22 without limitation:
23

- 24 a) To evaluate and investigate all reports of child abuse and/or neglect;
- 25 b) To visit children in foster home/facility placements in accordance
26 with the requirements for children in custody;
- 27 c) To investigate all relevant conditions of the facility that might affect
28

1 the child;

2 d) To report any violations of the home/facility's operating license
3 or requirements;

4 e) To ensure that children residing in their facilities are supervised at all
5 times by authorized adult caregivers;

6 f) To continually assess the adequacy and safety of a child's particular
7 placement;

8 g) To establish all necessary plans of care;

9 h) To report all known incidents of sexual assault, abuse or aggression
10 occurring in the foster home/facility;

11 i) To ensure that foster children are not left in dangerous conditions,
12 including being subjected to sexual, emotional, or physical abuse;

13 j) To ensure that each child in foster care is not maintained in custody
14 longer than is necessary to accomplish the purpose of custody;

15 k) To ensure that children are provided a non-threatening environment
16 for candid assessments of their living situation with care managers
17 or other supervisory personnel, to assure that incidents of abuse,
18 misconduct, or violations of rights may be reported without fear of
19 repercussion or not being believed; and

20 l) To provide a safe and stable home for future foster children, including
21 Plaintiff.

22 20. DOE 1's sexual abuse of Plaintiff was unlawful molestation under California law,
23 including California Code of Civil Procedure Section 340.1.
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1 21. Defendants, their agents, servants, and employees knew or should have known that DOE
2 1 was sexually abusing Plaintiff while under the supervision and control of COUNTY.

3 22. At all times material, it was reasonably foreseeable to Defendants, their agents, servants,
4 and employees that DOE 1's sexual abuse would likely result in injury to others,
5 including the sexual abuse of Plaintiff and other children, by DOE 1.
6

7 23. Defendants knew that their negligent, reckless, and outrageous conduct would inflict
8 severe emotional and psychological distress, as well as personal physical injury, on
9 others, including Plaintiff, and Plaintiff did in fact suffer severe emotional and
10 psychological distress and personal injury as a result of the Defendants' wrongful
11 conduct.
12

13 24. By reason of the wrongful acts of Defendants, Plaintiff JANE ROE V.G. sustained
14 physical and psychological injuries, including but not limited to: severe emotional and
15 psychological distress, physical and mental pain and suffering, and other damages to be
16 ascertained. Plaintiff has suffered and will continue to suffer serious and lifelong injuries
17 as a result of the abuse.
18

19 **FACTUAL ALLEGATIONS APPLICABLE TO ALL COUNTS**

20 25. Since 1981, COUNTY established and has operated JAMISON as a temporary shelter
21 care facility, housing minors taken into protective custody by COUNTY's law
22 enforcement agencies or social workers.
23

24 26. COUNTY, through JAMISON, takes in the most vulnerable members of the
25 community: children, at the most delicate and disruptive moments of their lives, a time
26 when they have been pulled away from their family, friends, schools, and community.
27 COUNTY represented and marketed JAMISON as a safe place for these children.
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1 Indeed, for many of the children who walk through its doors, JAMISON was to be the
2 *only* safe place during those traumatic moments. Thus, children were purportedly
3 housed, fed, secured, and protected by COUNTY while they were at JAMISON. These
4 children, including Plaintiff, were not afforded any options other than sheltering under
5 COUNTY, and had no agency to avoid the dangers to which they were exposed while
6 under COUNTY's care, custody, supervision, and control at JAMISON.
7

8 27. Upon information and belief, DOE 1 was an older, female minor temporarily held at
9 JAMISON in 2009, after COUNTY took her into protective custody.

10 28. Upon information and belief, COUNTY and JAMISON knew or should have known
11 that DOE 1 presented a heightened risk of harm to other cohabitants, including younger
12 female residents, due to her prior conduct, age, physical stature, and/or status. Despite
13 this knowledge, COUNTY failed to implement adequate safeguards, supervision,
14 monitoring, staffing, resident classification, separation protocols, or other protective
15 measures reasonably necessary to protect vulnerable cohabitants, including JANE ROE
16 V.G.
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18 29. Nevertheless, COUNTY and JAMISON permitted DOE 1 to spend significant amounts
19 of time, unsupervised and alone, with younger female residents by sharing two-person
20 bedrooms with them at JAMISON.
21

22 30. JANE ROE V.G., after being removed from her family by COUNTY's protective
23 services and brought to JAMISON, was the victim of repeated sexual abuse,
24 molestation, and other misconduct by DOE 1, while sharing a bedroom with her at
25 JAMISON.
26

27 31. JANE ROE V.G. and DOE 1 resided at JAMISON together for approximately one week.
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DOE 1 quickly developed and maliciously acted on a sexual interest in JANE ROE V.G. On JANE ROE V.G.'s first night at JAMISON, DOE 1 groped and fondled Plaintiff's breasts and genital area.

32. After this first incident of sexual abuse by DOE 1, JANE ROE V.G. reported that DOE 1 sexually assaulted her to a male staff member at JAMISON who, at all times material, was an employee or agent of COUNTY acting within the scope of employment. Instead of inquiring further or investigating JANE ROE V.G.'s comments, the JAMISON employee brushed it off entirely and told Plaintiff, "You guys are both girls, you'll be alright" and took no action.

33. The next night, after COUNTY and JAMISON failed to intervene, JANE ROE V.G. was sexually abused again by DOE 1. After this incident, JANE ROE V.G. disclosed to the JAMISON staff that DOE 1 had sexually abused her, but they once again completely dismissed her report and took no action.

34. Throughout the period that DOE 1 and JANE ROE V.G. were at the COUNTY facility together, DOE 1 sexually abused JANE ROE V.G. on approximately seven different occasions in their bedroom; approximately six occasions occurred after JANE ROE V.G. disclosed the sexual abuse to multiple JAMISON employees.

35. In fact, on multiple occasions throughout the week, JANE ROE V.G. reported to multiple employees that DOE 1 was repeatedly sexually abusing her. Each time, no affirmative action or further investigation was taken, with the COUNTY and JAMISON staff concealing reports or dismissing, mocking, shaming, and punishing JANE ROE V.G. instead. In one instance of reporting, COUNTY and JAMISON staff told JANE ROE V.G., a victim of repeated sexual abuse which COUNTY and JAMISON had

1 actual notice of, that it would be "too much effort to move her to another room." On
2 another instance, while JANE ROE V.G. was crying while reporting, multiple
3 COUNTY and JAMISON employees laughed in her face.

4 36. After various reports that JANE ROE V.G. made concerning her sexual abuse by DOE
5 1, COUNTY and JAMISON staff revoked multiple living privileges afforded to children
6 at JAMISON because JANE ROE V.G. was "bothering them too often." Indeed, JANE
7 ROE V.G. was reporting being sexually assaulted often enough for COUNTY to punish
8 her for being bothersome instead of investigating, elevating the report, alerting law
9 enforcement, or even moving JANE ROE V.G. to a different room; all while DOE 1
10 continued to repeatedly sexually abuse her. During the most vulnerable time of JANE
11 ROE V.G.'s life, the entities representing themselves as her only protectors, COUNTY
12 and JAMISON, shamed, embarrassed, punished, and minimized her for reporting sexual
13 abuse of which they had notice, which they allowed to occur under their supervision,
14 and which they refused to take any affirmative action whatsoever.

15 37. As a direct result of COUNTY's and JAMISON's failures, DOE 1 was repeatedly
16 provided access to, and opportunities to isolate and sexually abuse, JANE ROE V.G.
17 while both stayed at JAMISON. The abuse occurred under circumstances that should
18 have been prevented through the exercise of reasonable care, supervision, and oversight
19 by COUNTY and JAMISON personnel. Had COUNTY exercised appropriate
20 supervision and implemented reasonable protective measures in light of the known risks
21 posed by DOE 1, the repeated sexual abuse of JANE ROE V.G. would not have
22 occurred.

23 38. Upon information and belief, COUNTY's and JAMISON's failures included, but were
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1 not limited to, inadequate supervision of residents, inadequate staffing and monitoring
2 practices, failure to assess and respond appropriately to known behavioral risks, failure
3 to enforce resident-safety protocols, failure to protect vulnerable female residents from
4 foreseeable harm, failure to intervene despite circumstances indicating an unreasonable
5 risk of abuse, failure to investigate reports of child sexual abuse, and failure to report
6 suspected child abuse.
7

8 39. COUNTY and JAMISON had actual and constructive notice that Plaintiff was being
9 sexually abused by DOE 1 at the COUNTY facility, including through approximately
10 ten reports made by Plaintiff and information known to their officers, administrators,
11 agents, supervisors, employees, staff, and other personnel.
12

13 40. Despite such notice and knowledge, Defendants COUNTY, and Does 1 through 60,
14 inclusive, failed and/or refused to take reasonable steps to protect Plaintiff and other
15 minors from sexual abuse. Defendants failed to adequately supervise, monitor,
16 investigate, separate, and restrict DOE 1, failed to implement reasonable safeguards and
17 policies designed to protect vulnerable minors, failed to maintain adequate staffing and
18 supervision, and failed to timely report suspected child abuse to law enforcement or
19 other appropriate authorities. Defendants also negligently, intentionally, and/or willfully
20 implemented and maintained conditions that allowed the abuse to occur and continue,
21 including providing inadequate supervision for two resident rooms and failing to act
22 upon multiple reports of sexual abuse involving the same perpetrator.
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25 41. Upon information and belief, COUNTY and JAMISON fostered, maintained, and
26 allowed an environment in which minor foster children were vulnerable to sexual abuse
27 and harassment. Defendants had warnings and information that caused them to know, or
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1 reasonably suspect, that Plaintiff was being sexually abused and harassed, and further
2 knew that sexual assault and abuse among residents was a known and foreseeable risk in
3 the absence of adequate supervision, monitoring, investigation, reporting, and protective
4 measures.

5
6 42. As a direct and proximate result of Defendants' failures, DOE 1 was able to continue
7 sexually abusing female residents at COUNTY, including Plaintiff. Had Defendants,
8 through their officers, administrators, agents, supervisors, employees, staff, and other
9 personnel, timely and adequately supervised, monitored, investigated, reported,
10 restricted, removed, and/or otherwise intervened regarding DOE 1's conduct, all or some
11 of the sexual abuse inflicted upon Plaintiff would have been prevented, or Plaintiff
12 would not have been harmed to the extent she was harmed.

13
14 **FIRST CAUSE OF ACTION**

15 **CHILDHOOD SEXUAL ABUSE**

16 **(Against DOE 1 and DOES 2-20)**

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18 43. Plaintiff repeats and re-alleges by reference each and every allegation set forth above as
19 if fully set forth herein.

20 44. Plaintiff was the victim of unlawful childhood sexual assault, molestation and other
21 misconduct by minor female cohabitant DOE 1 in approximately 2009 when Plaintiff was
22 approximately sixteen years old. DOE 1 maliciously exploited COUNTY's and
23 JAMISON's lack of supervision to isolate and sexually assault JANE ROE V.G. in their
24 room by fondling and groping Plaintiff's genitals and breasts.

25
26 45. As a direct and legal result of this conduct, Plaintiff suffered severe and permanent injuries
27 including, but not limited to, physical and mental pain and suffering, severe emotional
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1 distress, physical injuries, past and future costs of medical care and treatment, and other
2 damages, in an amount not yet ascertained, but which exceed the minimum jurisdictional
3 limits of this Court.

4 46. In committing the acts described herein, the conduct of DOE 1 was despicable, done with
5 malice, oppressive influence, and exploitation, justifying an award of punitive damages
6 against them.
7

8 **SECOND CAUSE OF ACTION**

9 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

10 **(Against DOE 1, DOES 2-20)**

11 47. Plaintiff repeats and re-alleges by reference each and every allegation set forth above as
12 if fully set forth herein.
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14 48. The conduct of DOE 1 was outrageous and despicable and was calculated to cause great
15 harm to Plaintiff, who was a vulnerable, sixteen-year-old foster child that DOE 1
16 intentionally took advantage of to not only sexually abuse repeatedly but make her feel
17 shameful and helpless.
18

19 49. Plaintiff has suffered extreme and severe emotional distress as a direct result of DOE 1's
20 forceful coercion and repeated molestation and sexual abuse.

21 50. As a direct and legal result of this conduct by DOE 1, Plaintiff suffered severe and
22 permanent injuries including, but not limited to, physical and mental pain and suffering,
23 severe emotional distress, physical injuries, past and future costs of medical care and
24 treatment, and future loss of earnings and earning capacity, and other damages, in an
25 amount not yet ascertained, but which exceed the minimum jurisdictional limits of this
26 Court.
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1 51. In committing the acts described herein, the conduct of DOE 1 was despicable, done with
2 malice, oppressive influence, and exploitation, justifying an award of punitive damages
3 against DOE 1

4 **THIRD CAUSE OF ACTION**

5 **NEGLIGENCE**

6
7 **(Against COUNTY and JAMISON pursuant to Government Code §§ 815.2, 820, and**
8 **815.6; and against DOES 21-60)**

9 52. Plaintiff repeats and re-alleges by reference each and every allegation set forth above as
10 if fully set forth herein.

11 53. COUNTY is directly liable for negligence under California Government Code Section
12 815.6 for its failure to discharge mandatory duties set forth in, *inter alia*, Welfare and
13 Institutions Code sections 328, 16501(f), and 16504; Health and Safety Code section
14 1522, *et seq.*, Penal Code sections 11165.7, 11165.9 and 11166; Department of Social
15 Services Child Welfare Services Manual sections 31-320, 31-401, *et seq.*, and 31-501.
16 COUNTY is vicariously liable for Plaintiff injuries proximately caused by the acts
17 and/or omissions of COUNTY's employees, agents, and/or independent contractors.
18 *See* Cal. Gov. Code §§ 815.2(a), 820.

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21 54. Defendants, and each of them, had a duty to take reasonable steps to protect Plaintiff, a
22 minor, from known and/or foreseeable harm, including those presented by DOE 1, while
23 Plaintiff was in their care, custody, and control.

24
25 55. At all times relevant, Defendants, and each of them, accepted the entrustment of
26 minor Plaintiff. Plaintiff was under Defendants' direct supervision, care, and control,
27 thus creating a special, trusting, and fiduciary relationship between Plaintiff and
28

1 Defendants. Through this relationship with Plaintiff, Defendants stood *in loco parentis*
2 with Plaintiff. Specifically, Defendants took Plaintiff and other minors into their custody,
3 care, and control, which conferred upon Plaintiff and her family the reasonable belief
4 that Plaintiff, a minor child, would be protected and cared for, as if Defendants were
5 Plaintiff's own parents. This special relationship gave rise to a duty to prevent harms
6 caused by the intentional or criminal conduct of third parties, including other foster
7 care children such as DOE 1.
8

9 56. COUNTY and JAMISON failed to take reasonable steps or to implement reasonable
10 safeguards to avoid acts of sexual assault and abuse after COUNTY knew or had reason
11 to know or was otherwise on notice that Plaintiff was being sexually abused and
12 assaulted while under COUNTY's custody at JAMISON.
13

14 57. COUNTY and JAMISON were negligent in the placement and supervision of Plaintiff
15 while at JAMISON, and in the failure to take reasonable steps or to implement
16 reasonable safeguards to avoid acts of sexual assault and abuse, or to keep Plaintiff safe
17 by taking affirmative action against DOE 1.
18

19 58. Prior to, during, and after the sexual assault of Plaintiff, Defendants, and each of them,
20 by and through their agents, servants, volunteers, and employees, knew or reasonably
21 should have known of DOE 1's dangerous and exploitative propensities, and that DOE 1
22 was engaged in, or presented the risk of, sexual assault of cohabitants under COUNTY.
23

24 59. Defendants, and each of them, knew or should have known that without adequate
25 policies, protocols, and supervision, sexual assault and/or abuse of children by
26 their agents, employees, staff, and others was a known and foreseeable risk and danger.
27

28 60. In addition, at all times relevant herein and material hereto, Defendants, and each of them,

1 had a duty to warn, train and/or educate their administrators, management,
2 supervisors, employees, staff, and the children in their care, custody, and control,
3 including Plaintiff, about the risk of sexual assault and/or abuse, and how to recognize,
4 detect, prevent, or minimize such risk.

5
6 61. Defendants, and each of them, breached their duties by failing to use reasonable care and
7 implement reasonable measures to protect Plaintiff from their cohabitants, whom
8 Defendants knew or should have known, reasonably suspected, and/or were otherwise
9 on notice, would sexually assault Plaintiff, and other children. Then once Defendants were
10 actually put on notice via Plaintiff repeatedly reporting the abuse, Defendants failed to act
11 reasonably and allowed more sexual abuse to occur.

12
13 62. As a direct result of the foregoing, Plaintiff sustained physical, emotional, and
14 psychological injuries, along with pain and suffering. The sexual abuse and resulting
15 injuries to Plaintiff were caused by the negligent acts and omissions of Defendants.

16 **FOURTH CAUSE OF ACTION**

17 **NEGLIGENT HIRING, SUPERVISION, TRAINING, and RETENTION**

18
19 **(Against COUNTY and JAMISON pursuant to Government Code §§ 815.2, 820, and**
20 **815.6; and against DOES 21-60)**

21 63. Plaintiff repeats and re-alleges by reference each and every allegation set forth above as
22 if fully set forth herein.

23
24 64. COUNTY, JAMISON, and DOES 21 through 60, inclusive, and each of them, acting
25 through their officers, directors, administrators, and other supervisory employees, had a
26 responsibility and duty to adequately and properly investigate, hire, train, and supervise
27
28

1 their staff and agents and to protect minor children in their care, custody, and control
2 from harm caused by third parties and other minor foster children.

3 65. COUNTY, JAMISON, and DOES 21 through 60, inclusive, and each of them, acting
4 through their officers, directors, administrators, and other supervisory employees
5 breached their duties of care to the Plaintiff by allowing DOE 1 to repeatedly make
6 physical contact with Plaintiff without supervision; by failing to adequately supervise
7 DOE 1; by failing to investigate or otherwise confirm or deny such facts about DOE 1;
8 by failing to disclose, or by concealing from child protective agencies and law
9 enforcement that DOE 1 had engaged in sexually harassing behavior, molestation, and
10 abuse of minors; by refusing to intervene upon Plaintiff's multiple reports and
11 dismissing, embarrassing, or punishing her instead, thereby enabling, creating, and/or
12 facilitating DOE 1's continued access to Plaintiff and causing Plaintiff to be endangered,
13 sexually harassed, assaulted, and abused.

14 66. COUNTY, JAMISON, and DOES 21 through 60, inclusive, and each of them, acting
15 through their officers, directors, administrators, and other supervisory employees knew,
16 reasonably should have known, reasonably suspected, and/or were otherwise on notice
17 that DOE 1 posed a danger to other children and should not have direct unsupervised
18 contact with cohabitants at COUNTY because COUNTY, JAMISON, and DOES 21
19 through 60's, inclusive, officers, directors, administrators, and other supervisory
20 employees received complaints and/or had ample warnings about DOE 1's improper
21 behavior and repeated molestation of Plaintiff. Defendants, and each of them, should
22 have taken reasonable actions, including investigating, properly supervising, and
23
24
25
26
27
28

1 removing or separating DOE 1 from making contact with minor girls, including Plaintiff
2 at COUNTY.

3 67. COUNTY, JAMISON, and DOES 21 through 60, inclusive, and each of them, acting
4 through their officers, directors, administrators, and other supervisory employees,
5 breached their duty to timely and adequately investigate, hire, train, and supervise
6 employees properly equipped to prevent and respond to childhood sexual abuse,
7 including that of Plaintiff. Additionally, Defendants breached this duty through COUNTY's
8 and JAMISON's employees at JAMISON, acting as agents of COUNTY, who failed to act
9 reasonably to protect the minor children and prevent future abuse, such as by ignoring
10 multiple reports about DOE 1 and shaming or punishing Plaintiff instead of taking action
11 against child sex abuse.
12

13
14 68. Defendants negligently hired and/or retained several of COUNTY's and JAMISON's
15 employees at JAMISON and assigned them to positions of trust, authority, and
16 supervision in which they, acting as hired agents of Defendants, allowed for repeated
17 acts of childhood sexual assault against Plaintiff inside the COUNTY facility.
18

19 69. Defendants, and each of them, further failed to use reasonable care in investigating DOE
20 1 and failed to provide adequate warning to Plaintiff and other female minors of DOE
21 1's dangerous propensities.
22

23 70. Defendants, acting by and through their officers, board of directors, administrators,
24 agents, teachers, staff, and other employees, had the responsibility and duty to adequately
25 and properly investigate, hire, educate on signs of sexual abuse, train, and supervise
26 their staff and to protect their juvenile residents, including Plaintiff, from harm caused by
27 unfit, incompetent, and dangerous third parties, including other minor cohabitants such as
28

DOE 1.

71. As a direct result of the foregoing, Plaintiff sustained physical, emotional, and psychological injuries, along with pain and suffering. The sexual abuse and resulting injuries to Plaintiff were caused by the negligent acts and omissions of Defendants in the hiring, training, supervision, and retention of their employees.

FIFTH CAUSE OF ACTION

FAILURE TO REPORT SUSPECTED CHILD ABUSE

(Against COUNTY, JAMISON, and DOES 21-60 pursuant to Government Code §§ 815.2, 820, 815.6, Penal Code § 11166, and other applicable law)

72. Plaintiff repeats and re-alleges by reference each and every allegation set forth above as if fully set forth herein.

73. Under the Child Abuse and Neglect Reporting Act ("CANRA"), Defendants, by and through their agents, servants, volunteers, and/or employees, were childcare custodians and were under a statutory duty to report known or suspected incidents of sexual molestation or abuse of minors to a child protective agency pursuant to Penal Code section 11166, and/or not to impede the filing of any such report. Furthermore, Defendants were under a statutory duty to provide their employees with various acknowledgements of reporting requirements under Penal Code section 11166.

74. Defendants knew or should have known that a resident under their control had sexually molested, abused, or caused touching, battery, harm, and other injuries to minors, including Plaintiff, giving rise to a duty to report such conduct under Penal Code section 11166.

1 75. Defendants knew or should have known, in the exercise of reasonable diligence, that an
2 undue risk to minors, including Plaintiff, existed because Defendants did not
3 comply with California's mandatory reporting requirements.

4 76. By failing to report the continuing molestations and assaults, which Defendants knew of or
5 should have known of, and by failing to comply with the mandatory reporting
6 requirements provided under Penal Code section 11166, Defendants created the risk and
7 danger contemplated by CANRA. As a result, Defendants unreasonably and
8 wrongfully exposed Plaintiff and other minors to sexual molestation and abuse.
9

10 77. Plaintiff was a member of the class of persons Penal Code section 11166 was enacted
11 to protect.
12

13 78. As a proximate result of Defendants' failure to follow the mandatory reporting
14 requirements of Penal Code section 11166, Defendants wrongfully denied Plaintiff and
15 other minors the intervention of child protection services and allowed sexual abuse to
16 continue. Such public agencies would have changed the then-existing arrangements
17 and conditions that provided access and opportunities for the molestation of Plaintiff.
18

19 79. The physical, mental, and emotional damages and injuries resulting from the sexual
20 molestation of Plaintiff were the types of occurrences and injuries that the CANRA
21 was designed to prevent.
22

23 80. As a result, Defendants' failure to comply with the mandatory reporting requirements of
24 Penal Code section 11166 also constituted a *per se* breach of Defendants' duties to
25 Plaintiff.
26
27
28

1 81. As a direct and proximate result of the foregoing, Plaintiff sustained physical, emotional,
2 and psychological injuries, along with pain and suffering. The sexual abuse and resulting
3 injuries to Plaintiff were caused by the negligent failures of Defendants.

4 **SIXTH CAUSE OF ACTION**

5 **NEGLIGENT SUPERVISION OF A MINOR**

6
7 **(Against COUNTY and JAMISON pursuant to Government Code §§ 815.2, 820,**
8 **and 815.6; and against DOES 21-60)**

9 82. Plaintiff repeats and re-alleges by reference each and every allegation set forth above as
10 if fully set forth herein.

11 83. Defendants, and each of them, were responsible for the care, custody, control,
12 supervision, and protection of the minor children entrusted to them, including Plaintiff.
13 Defendants had a duty to adequately and properly supervise, monitor, and protect
14 Plaintiff from known and knowable dangers, including those presented by DOE 1.

15 84. Said Defendants, and each of them, knew or should have known that DOE 1 had and/or
16 was engaged in unlawful and/or inappropriate conduct with Plaintiff, yet Defendants, by
17 and through their officers, directors, administrators, supervisors, employees, and
18 other staff, breached their duty to properly and adequately supervise and protect Plaintiff
19 and turned a blind eye to the misconduct of DOE 1 towards Plaintiff, including by
20 allowing DOE 1, on multiple occasions, to fondle and grope Plaintiff's genitals and breasts.
21 COUNTY and JAMISON did not take any responsive action.

22 85. After Plaintiff reported the sexual abuse to COUNTY and JAMISON personnel,
23 Defendants failed to adequately supervise, monitor, separate, or otherwise protect
24 Plaintiff from DOE 1, and Plaintiff was thereafter subjected to additional sexual abuse.
25
26
27
28

1 86. Had said Defendants adequately and properly supervised, monitored, and protected
2 Plaintiff, Plaintiff would not have been harmed or would not have been harmed to the
3 extent that she was harmed.

4 87. As a direct and legal result of the acts and omissions of Defendants, Plaintiff suffered
5 physical and emotional injuries and other harm, including economic and non-economic
6 damages in amounts to be determined at the time of trial, but which exceed the
7 jurisdictional limits of the Superior Court.
8

9 88. COUNTY, JAMISON, and DOES 21 through 60, inclusive, also recklessly and
10 negligently failed to implement and/or enforce policies and procedures that were aimed
11 at preventing or detecting sexual assault and abuse of their minor residents.
12

13 89. Had COUNTY, JAMISON, and DOES 21 through 60, inclusive adequately performed
14 their duties and responsibilities, then Plaintiff would not have been subject to the sexual
15 abuse and harassment perpetrated by DOE 1.
16

17 90. As a direct and legal result of the acts and omissions of Defendants and DOES 21
18 through 60, inclusive, Plaintiff has been severely damaged emotionally and physically,
19 and otherwise, in amounts to be proven at the time of trial, but which exceed the
20 jurisdictional limits of this Court.
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6 **PRAYER FOR RELIEF**

7 WHEREFORE, Plaintiff prays for judgment against Defendants, and each of them, as
8 follows:

- 9 1. For an award of special (economic) and general (non-economic) damages according
10 to proof;
11
12 2. For punitive damages against DOE 1; and
13
14 3. For such other and further relief as the Court deems just and proper.
15

16 **JURY DEMAND**

17 Plaintiff demands a trial by jury on all causes of action which may be tried by a jury.
18
19
20
21
22

23
24 Dated: August 26, 2026

WEITZ & LUXENBERG, P.C.



26 Alexandra K. Sagona, Esq.
27 Attorney for Plaintiff
28

ATTORNEY OR PARTY WITHOUT ATTORNEY NAME: Alexandra Sagona, Esq. FIRM NAME: WEITZ & LUXENBERG, P.C. STREET ADDRESS: 1880 Century Park East, Suite 700 CITY: Los Angeles TELEPHONE NO.: (310) 247-0921 EMAIL ADDRESS: asagona@weitzlux.com ATTORNEY FOR (name): Plaintiff, Jane Roe V.G. STATE BAR NUMBER: 341450 STATE: CA ZIP CODE: 90067 FAX NO.:	FOR COURT USE ONLY ELECTRONICALLY FILED Superior Court of California, County of Kern By: Javen Silva Deputy Clerk 08/26/26 5:03 PM	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF KERN STREET ADDRESS: 1215 Truxtun Ave. MAILING ADDRESS: 1215 Truxtun Ave. CITY AND ZIP CODE: Bakersfield, CA 93301 BRANCH NAME: Metropolitan Division		
CASE NAME: JANE ROE V.G. 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)	CASE NUMBER: 26CUB03340 JUDGE: DEPT.:

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)



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*): SIX

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: 08/26/2026

Alexandra Sagona, 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

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

 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 August 27, 2026 /s/ Javen Silva, Deputy Clerk
Jane Roe V.G. v. A. Miriam Jamison Children's Center Foundation, a California Nonprofit Public Benefit Corporation, et al	
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	Case Number: 26CUB03340

By order of the presiding judge, the above-entitled case is assigned to the Honorable Thomas S. Clark for all purposes. It will be managed in Department/Division 17 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 December 9, 2026 at 8:30 A.M. in Department 17 at 1415 Truxtun Ave, Bakersfield, CA 93301 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 February 22, 2027 at 8:15 A.M. in Department 17 located at 1415 Truxtun Ave, Bakersfield, CA 93301. 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: August 27, 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 Thomas S. Clark as monitoring judge.

Judge Thomas S. Clark 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 Department 17 at 1415 Truxtun Ave, Bakersfield, CA 93301.

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 Thomas S. Clark. However, those cases that do not settle will be set for trial before him/her.

Superior Court Of California County Of Kern Special Rules Relating To Case Management Conferences

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: August 27, 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: August 27, 2026

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

Service List

Alexandra K Sagona
1880 Century Park E. Suite #700
Los Angeles, CA 90067
asagona@weitzlux.com