

# SUMMONS (CITACION JUDICIAL)

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

**NOTICE TO DEFENDANT:** Caitlyn Jenner, an individual,  
**(AVISO AL DEMANDADO):** and DOES 1 through 25, Defendant

**YOU ARE BEING SUED BY PLAINTIFF:** Peter Wolf-Millesi, an individual; Lea Wolf-  
**(LO ESTÁ DEMANDANDO EL DEMANDANTE):** Millesi, an individual; Elga Maurer, an  
individual; Nino Millesi, a minor by and through his Guardian Ad Litem, Lea Wolf-Millesi; and Gaetano  
Wolf-Millesi, a minor by and through his Guardian Ad Litem, Peter Wolf-Millesi and Lea Wolf-Millesi

**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](http://www.courtinfo.ca.gov/selfhelp)), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site ([www.lawhelpcalifornia.org](http://www.lawhelpcalifornia.org)), the California Courts Online Self-Help Center ([www.courtinfo.ca.gov/selfhelp](http://www.courtinfo.ca.gov/selfhelp)), or by contacting your local court or county bar association. **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](http://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](http://www.lawhelpcalifornia.org)), en el Centro de Ayuda de las Cortes de California, ([www.sucorte.ca.gov](http://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):

Los Angeles Superior Court  
111 North Hill Street  
111 North Hill Street  
Los Angeles, Ca 90012

CASE NUMBER:  
(Número del Caso):

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):  
Spencer R. Lucas, (SBN 232498) 310-477-1700 310-477-1699  
PANISH SHEA & BOYLE, LLP  
11111 Santa Monica Blvd.  
Los Angeles, Ca 90025  
DATE: 12/4/15

Clerk, by \_\_\_\_\_, Deputy  
(Secretario) (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)).

**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):

- 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):

4. ☐ by personal delivery on (date):

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ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Spencer R. Lucas, (SBN 232498) PANISH SHEA & BOYLE, LLP 11111 Santa Monica Blvd. Suite 700 Los Angeles, Ca 90025 TELEPHONE NO.: 310-477-1700 FAX NO.: 310-477-1699 ATTORNEY FOR (Name): Peter Wolf-Millesi, et al.		<b>FOR COURT USE ONLY</b>	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: 111 North Hill Street CITY AND ZIP CODE: Los Angeles, Ca 90012 BRANCH NAME: Central		CASE NUMBER:	
CASE NAME: Wolf-Millesi v. Jenner			
<b>CIVIL CASE COVER SHEET</b> <input checked="" type="checkbox"/> <b>Unlimited</b> (Amount demanded exceeds \$25,000) <input type="checkbox"/> <b>Limited</b> (Amount demanded is \$25,000 or less)		<b>Complex Case Designation</b> <input type="checkbox"/> <b>Counter</b> <input type="checkbox"/> <b>Joinder</b> Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)	
		JUDGE:	
		DEPT:	

*Items 1-6 below must be completed (see instructions on page 2).*

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

<b>Auto Tort</b> <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) <b>Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort</b> <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input checked="" type="checkbox"/> Other PI/PD/WD (23) <b>Non-PI/PD/WD (Other) Tort</b> <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-PI/PD/WD tort (35) <b>Employment</b> <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	<b>Contract</b> <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37) <b>Real Property</b> <input type="checkbox"/> Eminent domain/Inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) <b>Unlawful Detainer</b> <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) <b>Judicial Review</b> <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	<b>Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403)</b> <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) <b>Enforcement of Judgment</b> <input type="checkbox"/> Enforcement of judgment (20) <b>Miscellaneous Civil Complaint</b> <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42) <b>Miscellaneous Civil Petition</b> <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)
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2. This case ☐ is ☒ is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- |  |  |
|--|--|
| a. <input type="checkbox"/> Large number of separately represented parties   | d. <input type="checkbox"/> Large number of witnesses  |
| b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve | e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court |
| c. <input type="checkbox"/> Substantial amount of documentary evidence   | f. <input type="checkbox"/> Substantial postjudgment judicial supervision  |
3. Remedies sought (check all that apply): a. ☒ monetary b. ☐ nonmonetary; declaratory or injunctive relief c. ☐ punitive

4. Number of causes of action (specify): Two (2)

5. This case ☐ is ☒ is not a class action suit.

6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: 12/4/15

Spencer R. Lucas, (SBN 232498)

(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

### NOTICE

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

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# INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

CM-010

**To Plaintiffs and Others Filing First Papers.** If you are filing a first paper (for example, a complaint) in a civil case, you **must** complete and file, along with your first paper, the *Civil Case Cover Sheet* contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check **one** box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the **primary** cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

**To Parties in Rule 3.740 Collections Cases.** A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

**To Parties in Complex Cases.** In complex cases only, parties must also use the *Civil Case Cover Sheet* to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

## CASE TYPES AND EXAMPLES

### Auto Tort

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

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

Asbestos (04)  
Asbestos Property Damage  
Asbestos Personal Injury/Wrongful Death  
Product Liability (*not asbestos or toxic/environmental*) (24)  
Medical Malpractice (45)  
Medical Malpractice—Physicians & Surgeons  
Other Professional Health Care Malpractice  
Other 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 (16)  
Intellectual Property (19)  
Professional Negligence (25)  
Legal Malpractice  
Other Professional Malpractice (*not medical or legal*)  
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 or negligence*)  
Negligent Breach of Contract/Warranty  
Other Breach of Contract/Warranty  
Collections (e.g., money owed, open book accounts) (09)  
Collection Case—Seller Plaintiff  
Other Promissory Note/Collections Case  
Insurance Coverage (*not provisionally complex*) (18)  
Auto Subrogation  
Other Coverage  
Other Contract (37)  
Contractual Fraud  
Other Contract Dispute

### Real Property

Eminent Domain/Inverse Condemnation (14)  
Wrongful Eviction (33)  
Other Real Property (e.g., quiet title) (26)  
Writ of Possession of Real Property  
Mortgage Foreclosure  
Quiet Title  
Other Real Property (*not eminent domain, landlord/tenant, or foreclosure*)

### Unlawful Detainer

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

### Judicial Review

Asset Forfeiture (05)  
Petition Re: Arbitration Award (11)  
Writ of Mandate (02)  
Writ—Administrative Mandamus  
Writ—Mandamus on Limited Court Case Matter  
Writ—Other Limited Court Case Review  
Other Judicial Review (39)  
Review of Health Officer Order  
Notice of Appeal—Labor  
Commissioner Appeals

### Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400–3.403)

Antitrust/Trade Regulation (03)  
Construction Defect (10)  
Claims Involving Mass Tort (40)  
Securities Litigation (28)  
Environmental/Toxic Tort (30)  
Insurance Coverage Claims (*arising from provisionally complex case type listed above*) (41)

### Enforcement of Judgment

Enforcement of Judgment (20)  
Abstract of Judgment (Out of County)  
Confession of Judgment (*non-domestic relations*)  
Sister State Judgment  
Administrative Agency Award (*not unpaid taxes*)  
Petition/Certification of Entry of Judgment on Unpaid Taxes  
Other Enforcement of Judgment Case

### Miscellaneous Civil Complaint

RICO (27)  
Other Complaint (*not specified above*) (42)  
Declaratory Relief Only  
Injunctive Relief Only (*non-harassment*)  
Mechanics Lien  
Other Commercial Complaint Case (*non-tort/non-complex*)  
Other Civil Complaint (*non-tort/non-complex*)

### Miscellaneous Civil Petition

Partnership and Corporate Governance (21)  
Other Petition (*not specified above*) (43)  
Civil Harassment  
Workplace Violence  
Elder/Dependent Adult Abuse  
Election Contest  
Petition for Name Change  
Petition for Relief from Late Claim  
Other Civil Petition



## CIVIL CASE COVER SHEET ADDENDUM AND STATEMENT OF LOCATION (CERTIFICATE OF GROUNDS FOR ASSIGNMENT TO COURTHOUSE LOCATION)

**This form is required pursuant to Local Rule 2.0 in all new civil case filings in the Los Angeles Superior Court.**

**Item I.** Check the types of hearing and fill in the estimated length of hearing expected for this case:

JURY TRIAL? ☒ YES CLASS ACTION? ☐ YES LIMITED CASE? ☐ YES TIME ESTIMATED FOR TRIAL 14 ☐ HOURS/ ☒ DAYS

**Item II.** Indicate the correct district and courthouse location (4 steps – If you checked “Limited Case”, skip to Item III, Pg. 4):

**Step 1:** After first completing the Civil Case Cover Sheet form, find the main Civil Case Cover Sheet heading for your case in the left margin below, and, to the right in Column **A**, the Civil Case Cover Sheet case type you selected.

**Step 2:** Check one Superior Court type of action in Column **B** below which best describes the nature of this case.

**Step 3:** In Column **C**, circle the reason for the court location choice that applies to the type of action you have checked. For any exception to the court location, see Local Rule 2.0.

### Applicable Reasons for Choosing Courthouse Location (see Column C below)

1. Class actions must be filed in the Stanley Mosk Courthouse, central district.
2. May be filed in central (other county, or no bodily injury/property damage).
3. Location where cause of action arose.
4. Location where bodily injury, death or damage occurred.
5. Location where performance required or defendant resides.
6. Location of property or permanently garaged vehicle.
7. Location where petitioner resides.
8. Location wherein defendant/respondent functions wholly.
9. Location where one or more of the parties reside.
10. Location of Labor Commissioner Office

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

	<b>A</b> Civil Case Cover Sheet Category No.	<b>B</b> Type of Action (Check only one)	<b>C</b> Applicable Reasons - See Step 3 Above
<b>Auto Tort</b>	Auto (22)	<input checked="" type="checkbox"/> A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	1., 2., ④
	Uninsured Motorist (46)	<input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death – Uninsured Motorist	1., 2., 4.
<b>Other Personal Injury/ Property Damage/ Wrongful Death Tort</b>	Asbestos (04)	<input type="checkbox"/> A6070 Asbestos Property Damage <input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	2. 2.
	Product Liability (24)	<input type="checkbox"/> A7260 Product Liability (not asbestos or toxic/environmental)	1., 2., 3., 4., 8.
	Medical Malpractice (45)	<input type="checkbox"/> A7210 Medical Malpractice - Physicians & Surgeons <input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1., 4. 1., 4.
	Other Personal Injury Property Damage Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall) <input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.) <input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress <input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1., 4. 1., 4. 1., 3. 1., 4.



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CASE NUMBER

	<b>A</b> Civil Case Cover Sheet Category No.	<b>B</b> Type of Action (Check only one)	<b>C</b> Applicable Reasons - See Step 3 Above
Non-Personal Injury/ Property Damage/ Wrongful Death Tort	Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1., 3.
	Civil Rights (08)	<input type="checkbox"/> A6005 Civil Rights/Discrimination	1., 2., 3.
	Defamation (13)	<input type="checkbox"/> A6010 Defamation (slander/libel)	1., 2., 3.
	Fraud (16)	<input type="checkbox"/> A6013 Fraud (no contract)	1., 2., 3.
	Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice <input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)	1., 2., 3. 1., 2., 3.
	Other (35)	<input type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	2., 3.
Employment	Wrongful Termination (36)	<input type="checkbox"/> A6037 Wrongful Termination	1., 2., 3.
	Other Employment (15)	<input type="checkbox"/> A6024 Other Employment Complaint Case <input type="checkbox"/> A6109 Labor Commissioner Appeals	1., 2., 3. 10.
Contract	Breach of Contract/ Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction) <input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence) <input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud) <input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	2., 5. 2., 5. 1., 2., 5. 1., 2., 5.
	Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff <input type="checkbox"/> A6012 Other Promissory Note/Collections Case	2., 5., 6. 2., 5.
	Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1., 2., 5., 8.
	Other Contract (37)	<input type="checkbox"/> A6009 Contractual Fraud <input type="checkbox"/> A6031 Tortious Interference <input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1., 2., 3., 5. 1., 2., 3., 5. 1., 2., 3., 8.
	Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation      Number of parcels _____	2.
	Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2., 6.
Real Property	Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure <input type="checkbox"/> A6032 Quiet Title <input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2., 6. 2., 6. 2., 6.
	Unlawful Detainer-Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	2., 6.
	Unlawful Detainer-Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer	Unlawful Detainer- Post-Foreclosure (34)	<input type="checkbox"/> A6020F Unlawful Detainer-Post-Foreclosure	2., 6.
	Unlawful Detainer-Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2., 6.



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	<b>A</b> Civil Case Cover Sheet Category No.	<b>B</b> Type of Action (Check only one)	<b>C</b> Applicable Reasons - See Step 3 Above
<b>Judicial Review</b>	Asset Forfeiture (05)	<input type="checkbox"/> A6108 Asset Forfeiture Case	2., 6.
	Petition re Arbitration (11)	<input type="checkbox"/> A6115 Petition to Compel/Confirm/Vacate Arbitration	2., 5.
	Writ of Mandate (02)	<input type="checkbox"/> A6151 Writ - Administrative Mandamus <input type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter <input type="checkbox"/> A6153 Writ - Other Limited Court Case Review	2., 8. 2. 2.
	Other Judicial Review (39)	<input type="checkbox"/> A6150 Other Writ /Judicial Review	2., 8.
<b>Provisionally Complex Litigation</b>	Antitrust/Trade Regulation (03)	<input type="checkbox"/> A6003 Antitrust/Trade Regulation	1., 2., 8.
	Construction Defect (10)	<input type="checkbox"/> A6007 Construction Defect	1., 2., 3.
	Claims Involving Mass Tort (40)	<input type="checkbox"/> A6006 Claims Involving Mass Tort	1., 2., 8.
	Securities Litigation (28)	<input type="checkbox"/> A6035 Securities Litigation Case	1., 2., 8.
	Toxic Tort Environmental (30)	<input type="checkbox"/> A6036 Toxic Tort/Environmental	1., 2., 3., 8.
	Insurance Coverage Claims from Complex Case (41)	<input type="checkbox"/> A6014 Insurance Coverage/Subrogation (complex case only)	1., 2., 5., 8.
<b>Enforcement of Judgment</b>	Enforcement of Judgment (20)	<input type="checkbox"/> A6141 Sister State Judgment <input type="checkbox"/> A6160 Abstract of Judgment <input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations) <input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes) <input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax <input type="checkbox"/> A6112 Other Enforcement of Judgment Case	2., 9. 2., 6. 2., 9. 2., 8. 2., 8. 2., 8., 9.
	RICO (27)	<input type="checkbox"/> A6033 Racketeering (RICO) Case	1., 2., 8.
<b>Miscellaneous Civil Complaints</b>	Other Complaints (Not Specified Above) (42)	<input type="checkbox"/> A6030 Declaratory Relief Only <input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment) <input type="checkbox"/> A6011 Other Commercial Complaint Case (non-tort/non-complex) <input type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)	1., 2., 8. 2., 8. 1., 2., 8. 1., 2., 8.
	Partnership Corporation Governance (21)	<input type="checkbox"/> A6113 Partnership and Corporate Governance Case	2., 8.
<b>Miscellaneous Civil Petitions</b>	Other Petitions (Not Specified Above) (43)	<input type="checkbox"/> A6121 Civil Harassment <input type="checkbox"/> A6123 Workplace Harassment <input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case <input type="checkbox"/> A6190 Election Contest <input type="checkbox"/> A6110 Petition for Change of Name <input type="checkbox"/> A6170 Petition for Relief from Late Claim Law <input type="checkbox"/> A6100 Other Civil Petition	2., 3., 9. 2., 3., 9. 2., 3., 9. 2. 2., 7. 2., 3., 4., 8. 2., 9.



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**Item III. Statement of Location:** Enter the address of the accident, party's residence or place of business, performance, or other circumstance indicated in Item II., **Step 3** on Page 1, as the proper reason for filing in the court location you selected.

**REASON:** Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected for this case.

☐ 1. ☐ 2. ☒ 3. ☒ 4. ☐ 5. ☐ 6. ☐ 7. ☐ 8. ☐ 9. ☐ 10.

ADDRESS: Pacific Coast Hwy/South of Corral Canyon Rd

CITY:

Malibu

STATE:

CA

ZIP CODE:

**Item IV. Declaration of Assignment:** I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that the above-entitled matter is properly filed for assignment to the Central courthouse in the Los Angeles District of the Superior Court of California, County of Los Angeles [Code Civ. Proc., § 392 et seq., and Local Rule 2.0, subds. (b), (c) and (d)].

Dated: 12/4/15



(SIGNATURE OF ATTORNEY/FILING PARTY)

Spencer R. Lucas, Esq.

**PLEASE HAVE THE FOLLOWING ITEMS COMPLETED AND READY TO BE FILED IN ORDER TO PROPERLY COMMENCE YOUR NEW COURT CASE:**

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet, Judicial Council form CM-010.
4. Civil Case Cover Sheet Addendum and Statement of Location form, LACIV 109, LASC Approved 03-04 (Rev. 03/11).
5. Payment in full of the filing fee, unless fees have been waived.
6. A signed order appointing the Guardian ad Litem, Judicial Council form CIV-010, if the plaintiff or petitioner is a minor under 18 years of age will be required by Court in order to issue a summons.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the summons and complaint, or other initiating pleading in the case.



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**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

PETER WOLF-MILLESSE, an individual; LEA WOLF-MILLESSE, an individual; ELGA MAURER, an individual; NINO MILLESSE, a minor by and through his Guardian Ad Litem, LEA WOLF-MILLESSE; and GAETANO WOLF-MILLESSE, a minor by and through his Guardians Ad Litem, PETER WOLF-MILLESSE and LEA WOLF-MILLESSE,

Plaintiff,

v.

CAITLYN JENNER, an individual, and  
DOES 1 through 25,  
Defendant.

Case No.

**COMPLAINT FOR DAMAGES**

1. **NEGLIGENCE**
2. **NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**

**DEMAND FOR JURY TRIAL**

COMES NOW Plaintiffs, PETER WOLF-MILLESSE, an individual, LEA WOLF-MILLESSE, an individual; ELGA MAURER, an individual; NINO MILLESSE, a minor by and through his Guardian Ad Litem LEA WOLF MILLESSE; and GAETANO WOLF-MILLESSE, a minor by and through his Guardians Ad Litem, PETER WOLF-MILLESSE and LEA WOLF MILLESSE (hereafter "Plaintiffs"), for causes of action against Defendants, CAITLYN JENNER, an individual, and DOES 1 through 25, inclusive, (hereafter "Defendants"), who complains and alleges as follows:



## GENERAL ALLEGATIONS

1. This personal injury action arises from a four car automobile collision which occurred on February 7, 2015.

2. On February 7, 2015, at approximately 12:00 p.m., Plaintiffs (the Wolf-Millesi family) were driving southbound in the #1 traffic lane on Pacific Coast Highway State Route 1. Plaintiff PETER WOLF MILLESI was operating a 2006 Black H2 Hummer, bearing California license plate number LACMBA (hereinafter "PLAINTIFFS' VEHICLE"). Coming in the opposite direction towards the Wolf-Millesi family was DEFENDANT CAITLYN JENNER (at the time formally named Bruce Jenner) operating a 2013 Cadillac Escalade, California license plate number 7AAF4E4. DEFENDANT JENNER was towing a vehicle trailer and off-road vehicle, trailer license plate number 6NGX355 (hereinafter collectively "DEFENDANT'S VEHICLE").

3. Plaintiff is informed and believes and based thereon alleges that DEFENDANT JENNER was inattentive and traveling at unsafe speed for traffic conditions and caused a high-force collision with decedent Kim Diane Howe, driving a 2006 Lexus LS 430 California license plate number 5VXR733 (hereinafter "HOWE'S LEXUS"). HOWE'S LEXUS was then pushed into oncoming traffic striking the Wolf-Millesi family head-on.

4. Plaintiff is informed and believes and based thereon alleges that due to the significant speed and force of DEFENDANT'S VEHICLE, JENNER was unable to stop after the first collision and continued on and rear-ended another northbound vehicle driven by Jessica Marie Steindorff. Ms. Steindorff was driving a 2010 Toyota Prius, California license plate number 6N6Y355 (hereinafter "STEINDORFF'S PRIUS").

5. Plaintiff is informed and believes and based thereon alleges that Defendant JENNER was at fault for the SUBJECT INCIDENT when she was inattentive, failed to keep a proper lookout, and drove at an unsafe speed for road conditions in violation of California Vehicle Code §22305. As result of Defendants' negligence, the driver and occupants of Plaintiffs' vehicle, PETER WOLF-MILLES, LEA WOLF-MILLES, ELGA MAURER; NINO MILLES, and GAETANO WOLF-MILLES suffered significant personal injuries and emotional distress.

1 Plaintiffs are informed and believe, and thereon allege, that at all times herein mentioned,

2 6. Defendants JENNER and DOES 1 through 100, inclusive, and each of them,  
3 owned, leased, managed, maintained, repaired, entrusted and controlled DEFENDANTS  
4 VEHICLE, which was used as part of Defendants' businesses. Plaintiffs are further informed and  
5 believe, and thereon allege, that at all times herein mentioned, Defendant CAITLYN JENNER  
6 was the operator of DEFENDANT'S VEHICLE.

7 7. Plaintiffs are informed and believe, and thereon allege, that at all times mentioned  
8 herein, Defendants, and each of them, including DOES 1 through 100, inclusive, and each of  
9 them, were agents, servants, employees, successors in interest, and/or joint ventures of their co-  
10 Defendants, and were, as such, acting within the course, scope, and authority of said agency,  
11 employment, and/or venture. Plaintiffs are informed and believe, and thereon allege, that at all  
12 times herein relevant,

13 8. Defendant JENNER was an employee and/or agent of Defendants DOES 1  
14 through 100, inclusive, and each of them, and was acting within the course and scope of her  
15 employment with Defendants DOES 1 through 25, inclusive, and each of them.

16 9. Plaintiffs are informed and believe, and thereon allege, that at all times herein  
17 relevant, including the time of the SUBJECT INCIDENT collision, Defendant JENNER was  
18 driving the SUBJECT VEHICLE so she could perform the duties and/or activities of her  
19 employment, agency, joint venture, and business relationship with Defendants DOES 1 through  
20 100, inclusive, and each of them. Plaintiff is further informed and believes, and thereupon alleges,  
21 that Defendants DOES 1 through 100, inclusive, and each of them, specifically authorized,  
22 permitted and required Defendant JENNER to use DEFENDANT'S VEHICLE for the purposes of  
23 the employment, agency, joint venture, and business relationship between JENNER and DOES 1-  
24 25.

25 10. Plaintiff PETER WOLF-MILLES I was, at all times herein relevant, a resident of  
26 the City of Malibu in the County of Los Angeles, State of California.

27 11. Plaintiff LEA WOLF-MILLES I was, at all times herein relevant, a resident of the  
28 City of Malibu in the County of Los Angeles, State of California.



12. Plaintiff ELGA MAURER was, at all times herein relevant, a resident of Malibu in the County of Los Angeles, State of California.

13. Plaintiff NINO MILLESI was, at all times herein relevant, a resident of Malibu in the County of Los Angeles, State of California.

14. Plaintiff GEATANO WOLF-MILLES was, at all times herein relevant, a resident of Malibu in the County of Los Angeles, State of California.

15. Plaintiffs are informed and believe, and thereon allege that at all times herein relevant; Defendant CAITLYN JENNER was a resident of the City of Woodland Hills in the County of Los Angeles, State of California. At the time of the SUBJECT INCIDENT, CAITLYN JENNER according to the California Highway Patrol collision report was known as BRUCE WILLIAM JENNER, but has since legally changed her name to CAITLYN JENNER.

16. The true names and capacities, whether individual, plural, corporate, partnership, associate, or otherwise, of DOES 1 through 25, inclusive, are unknown to Plaintiffs who therefore sue said Defendants by such fictitious names. The full extent of the facts linking such fictitiously sued Defendants is unknown to Plaintiffs. Plaintiffs are informed and believe, and thereon allege, that each of the Defendants designated herein as a DOE was, and is, negligent, or in some other actionable manner, responsible for the events and happenings hereinafter referred to, and thereby negligently, or in some other actionable manner, legally and proximately caused the hereinafter described injuries and damages to Plaintiffs. Plaintiffs will hereafter seek leave of the Court to amend this Complaint to show the Defendants' true names and capacities after the same have been ascertained.

# **FIRST CAUSE OF ACTION**

## **(NEGLIGENCE – by all PLAINTIFFS against Defendants JENNER and DOES 1 through 25, Inclusive)**

11. Plaintiffs re-allege and incorporate herein by reference each and every allegation and statement contained in the prior paragraphs.

12. Plaintiffs are informed and believe, and thereon allege, that at all times mentioned herein, Defendants CAITLYN JENNER and DOES 1 through 25, inclusive, owed a duty of care

1 to all reasonably foreseeable people, including Plaintiffs to own, lease, manage, maintain,  
2 control, entrust, and operate DEFENDANT'S VEHICLE in a reasonable manner. Plaintiffs are  
3 informed and believe, and thereon allege, that at all times mentioned herein,

4 13. Defendants CAITLYN JENNER and DOES 1 through 25, inclusive, carelessly,  
5 negligently, and recklessly owned, leased, managed, maintained, controlled, entrusted, required  
6 the transportation of, and operated DEFENDANT'S VEHICLE. Plaintiffs are informed and  
7 believe and based thereon allege that such conduct included, but is not limited to, requiring the  
8 transportation of DEFENDANT'S VEHICLE and driving at an unsafe speed for road conditions  
9 and rear ending HOWE'S LEXUS pushing it into oncoming traffic and into a head on collision  
10 with PLAINTIFF'S VEHICLE, thereby causing Plaintiffs to sustain severe and permanent injuries.

11 14. Plaintiff is informed and believes, and thereon alleges, that the negligent, grossly  
12 negligent, reckless, and unlawful conduct of Defendants CAITLYN JENNER and DOES 1  
13 through 100, inclusive, in regards to the ownership, lease, management, maintenance, control,  
14 entrustment and operation of DEFENDANT'S VEHICLE was the direct, legal and proximate  
15 cause of the injuries and damages to Plaintiffs as herein alleged.

16 15. Plaintiff is informed and believes and thereupon alleges that Defendants CAITLYN  
17 JENNER and DOES 1 through 100, inclusive, and each of them, were subject to laws and safety  
18 regulations pertaining to vehicle safety and maintenance, and that such laws and safety regulations  
19 were intended to preserve life and prevent or minimize the risk of bodily injury to persons  
20 traveling on public California roadways by ensuring the proper safe driving while traveling on  
21 those public California roadways. Specifically, Defendant CAITLYN JENNER and DOES 1  
22 through 25, inclusive, caused the SUBJECT INCIDENT by operating DEFENDANT'S VEHICLE  
23 in violation of California Vehicle Code §22305.

24 16. Plaintiffs are informed and believe and thereupon allege that they are/were a  
25 member of a class (persons traveling on public California roadways) for whose benefit those laws  
26 and safety regulations were passed and designed to protect.

27 17. Plaintiffs are informed and believe and thereupon allege that the violation of  
28 California Vehicle Code §22305 by Defendants CAITLYN JENNER and DOES 1 through 100,



1 inclusive, and each of them, was the proximate and actual cause of Plaintiffs' damages as  
2 outlined below.

3 18. As a legal, direct and proximate result of the aforementioned conduct of  
4 Defendants CAITLYN JENNER and DOES 1 through 100, inclusive, and each of them, Plaintiffs  
5 PETER WOLF-MILLES, LEA WOLF-MILLES, ELGA MAURER, NINO MILLES and  
6 GAETANO WOLF-MILLES were injured and hurt in their health, strength and activity,  
7 sustaining serious injuries to their bodies, and shock and injury to their nervous systems and  
8 persons, all of which said injuries have caused and continue to cause each Plaintiff great physical  
9 and mental pain and suffering. Plaintiffs are further informed and believe, and thereon allege, that  
10 said injuries will result in some or all permanent disability to each of them, all to their general  
11 damage in an amount which will be stated according proof pursuant to California Code of Civil  
12 Procedure Section 425.10.

13 19. By way of example, Elga Maurer has suffered a severe cervical fracture as a result  
14 of the severe frontal impact which has permanently debilitated her. Peter Wolf-Milles has  
15 suffered severe nerve damage to his wrists and hands from gripping the steering wheel in this  
16 tremendous force impact causing him to be disabled from work. Lea Wolf-Milles has suffered  
17 significant blunt force trauma as the front passenger occupant requiring emergency and ongoing  
18 orthopedic treatment. The month old newborn baby in the vehicle Gaetano was not responding at  
19 the scene and had to be transported to UCLA emergency by ambulance for treatment. The  
20 emotional effects of being involved in a collision that has taken the life of another has caused  
21 tremendous distress and suffering for the Wolf-Milles family.

22 20. As a legal, direct and proximate result of the aforementioned conduct of  
23 Defendants CAITLYN JENNER and DOES 1 through 100, inclusive, and each of them, Plaintiffs  
24 were prevented from attending their usual or potential occupation and/or Plaintiffs are informed  
25 and believe, and thereon allege, that each of them may be prevented from attending their  
26 occupations in the future, and thereby each will also sustain a loss of earning capacity and loss of  
27 opportunity, in addition to lost earnings, past, present and future according to proof, pursuant to  
28 California Code of Civil Procedure Section 425.10.

21. As a legal, direct and proximate result of the aforementioned conduct of the Defendants CAITLYN JENNER and DOES 1 through 100, inclusive, and each of them, Plaintiffs were each compelled to and did employ the services of hospitals, physicians, surgeons, nurses and the like, to care for and treat each of them, and did incur hospital, medical, professional and incidental expenses, and Plaintiffs are informed and believe, and thereon allege, that by reason of each of their injuries, will necessarily incur additional like expenses for an indefinite period of time in the future, the exact amount of which expenses will be stated according to proof, pursuant to California of Civil Procedure Section 425.10.

22. As a direct and proximate result of the aforementioned conduct of Defendants, and each of them, Plaintiffs have sustained property damage in an amount not yet ascertained, and other economic damage as a result of the property damage.

### **SECOND CAUSE OF ACTION**

#### **(NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS- by all Plaintiffs as Against Defendants CAITLYN JENNER and DOES 1 through 25, Inclusive)**

23. Plaintiffs re-allege and incorporate herein by reference each and every allegation and statement contained in the prior paragraphs.

24. At the time of the SUBJECT INCIDENT, Plaintiffs PETER WOLF-MILLES, LEA WOLF-MILLES, ELGA MAURER, NINO MILLES and GAETANO WOLF-MILLES were contemporaneously aware of the injury-producing event and the injuries suffered by one another in the SUBJECT INCIDENT caused by Defendant CAITLYN JENNER.

25. Plaintiffs were within the zone of danger and were in fact direct victims of the impact during the SUBJECT INCIDENT.

26. As a result of observing the injuries to each other, all closely related as parents, children, spouses and grandparents, Plaintiffs suffered and continue to suffer severe emotional distress damages beyond that which would be expected in a disinterested witness.

### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiffs PETER WOLF-MILLES, LEA WOLF-MILLES, ELGA MAURER, NINO MILLES and GAETANO WOLF-MILLES pray judgment against Defendants



CAITLYN JENNER and DOES 1 through 25, inclusive, and each of them, as follows:

1. For general damages (also known as non-economic damages), including but not limited to, past and future pain and suffering and disfigurement, in an amount in excess of the jurisdictional minimum, according to proof;
2. For special damages (also known as economic damages), including but not limited to past and future hospital, medical, professional, and incidental expenses as well as past and future loss of earnings, loss of opportunity, and loss of earning capacity, in excess of the jurisdictional minimum, according to proof;
3. For damages for Plaintiffs' property and economic damage related thereto, according to proof;
4. For hospital, medical, professional and incidental expenses, according to proof;
5. For damages for Plaintiff's other economic losses, according to proof;
6. For prejudgment interest, according to proof;
7. For costs of suit incurred herein, according to proof;
8. For such other and further relief as the Court may deem just and proper.

DATED: December 4, 2015

PANISH SHEA & BOYLE LLP

By:



Spencer R. Lucas  
Attorneys for Plaintiffs

**DEMAND FOR JURY TRIAL**

Plaintiffs PETER WOLF-MILLES, LEA WOLF-MILLES, ELGA MAURER,  
NINO MILLES and GAETANO WOLF-MILLES hereby demand a trial by jury as to all causes  
of action.

DATED: December 4, 2015

PANISH SHEA & BOYLE LLP

By:



Spencer R. Lucas  
Attorneys for Plaintiffs