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14 SUPERIOR COURT OF THE STATE OF CALIFORNIA
15 IN AND FOR THE COUNTY OF RIVERSIDE

16 SERVICE EMPLOYEES INTERNATIONAL
17 UNION, UNITED HEALTHCARE
18 WORKERS – WEST; AND
19 DAVE REGAN,

19 Plaintiffs,

20 v.

21 NJOKI WOODS,

22 Defendant.

Case No. **RIC 1902014**
COMPLAINT FOR DEFAMATION

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE

MAR 21 2019

SIRACUSA

By Fax

AP
MAR 21 2019
ET

1 Plaintiffs, Service Employees International Union- United Healthcare Workers West, and
2 Dave Regan hereby allege and complain as follows:

3 **I. PARTIES**

4 1. Plaintiff SEIU, United Healthcare Workers – West (“SEIU-UHW” or the “Union”)
5 is a labor organization that represents approximately 95,000 healthcare workers in hospitals and
6 clinics throughout California, and at all relevant times herein maintained an office located in Los
7 Angeles County, California. SEIU-UHW also maintains offices across California in Oakland,
8 Fresno, Sacramento, San Francisco, San Jose, and Stockton.

9 2. Plaintiff Dave Regan (“Regan”) is an employee and the elected President of SEIU-
10 UHW; he resides in Contra Costa County, California. Regan brings this action as an individual.

11 3. Defendant Njoki Woods (“Woods”) is a former employee of SEIU-UHW, and
12 upon information and belief, currently resides in Riverside County, California.

13 **II. JURISDICTION AND VENUE**

14 4. Woods, upon information and belief, is domiciled within Riverside County,
15 California. Therefore, Woods is subject to the personal jurisdiction of this Court, and this Court
16 has the power to render an effective judgment against Woods.

17 5. Woods, upon information and belief, is an individual who is and has been, at all
18 times mentioned herein, a resident of Riverside County, in the State of California.

19 **III. FACTUAL ALLEGATIONS**

20 **A. SEIU-UHW IS AS A VOICE FOR HEALTHCARE WORKERS,
21 CONSUMERS, AND PATIENTS THROUGHOUT CALIFORNIA.**

22 6. SEIU-UHW is a labor organization representing approximately 95,000 healthcare
23 workers in hospitals and clinics throughout California; the Union is funded solely by the
24 voluntary, dues payments of its members.

25 7. SEIU-UHW is committed to improving the working lives of its members;
26 supporting their families; ensuring and providing “the best quality care to our patients,
27 consumers, and residents; and promoting quality, affordable health care for all.” To this end, the
28 mission of SEIU-UHW is to “build a workers’ organization dedicated to being a powerful force to
change workers’ lives and fight for social and economic justice.” In line with its mission, SEIU-

1 UHW's "objective [is] to build a strong and more effective labor movement by organizing
2 unorganized workers, building an effective political voice for working people, and protecting all
3 workers from unacceptable or unjust actions by employers."

4 8. The highest leadership body of SEIU-UHW is the Executive Board, which consists
5 of elected rank and file members, a president, and vice-president.

6 9. Regan has served as president of SEIU-UHW since 2011. The membership re-
7 elected Regan in 2014 and, again, in 2017. In his role as president, Regan is responsible for
8 "administer[ing] the affairs of the Union and implement[ing] the policies of the Union on a day-
9 to-day basis." This includes, but is not limited to, "[r]epresenting the Union in the community, in
10 the media and at meetings, conferences, or conventions of organizations that the Union is
11 affiliated with; and generally acting as the chief spokesperson for the Union."

12 10. In furtherance of its mission, SEIU-UHW hires staff to assist in organizing and
13 recruiting non-union healthcare workers to join SEIU-UHW; to assist in organizing and recruiting
14 community members, who do not work at a hospital or clinic, to join the Union and support the
15 mission and objectives of SEIU-UHW; to assist in the administration of its collective bargaining
16 agreements with employer-hospitals and clinics; and to assist in the representation of its more
17 than 95,000 members in their respective workplaces.

18 11. In May 2015, SEIU-UHW hired Woods as a Union organizer. As a Union
19 organizer, Woods was responsible for, among other things, recruiting and organizing non-union
20 healthcare workers and community members, administering collective bargaining agreements
21 covering SEIU-UHW members, and assisting and representing healthcare workers employed at
22 hospitals or clinics that have a collective bargaining relationship with SEIU-UHW.

23 **B. WHILE EMPLOYED WITH SEIU-UHW WOODS MAKES FALSE**
24 **STATEMENTS ABOUT SEIU-UHW AND ITS PRESIDENT TO MIKE**
25 **ELK, AN INTERENT BLOGGER.**

26 12. On March 1, 2019, at 12:23 a.m., Mike Elk ("Elk"), the Senior Labor Reporter
27 with PaydayReport.com, emailed Steve Trossman, a SEIU-UHW employee, asking for a response
28 from SEIU-UHW regarding various statements that Woods had made about SEIU-UHW and
Regan. Email Attached as Exhibit A, which is incorporated by reference as though fully set

1 **forth herein.**

2 13. In his March 1 email, Elk wrote that Woods made the following statements to him:

3 a. Regan engaged in a culture of “sexual favoritism”;

4 b. At a December 2017 meeting, Regan addressed a Union membership meeting
5 and flashed the telephone numbers of some attorneys, and told people to call
6 those attorneys if something happened at the meeting, and then said that SEIU-
7 UHW would go after folks if they made allegations;

8 c. Regan was drunk all the time during the day; and

9 d. SEIU-UHW employees were told that they had to give money and campaign
10 on their personal time for Dave Regan’s candidates.

11 14. SEIU-UHW did not respond to Elk regarding these false claims.

12 **C. ELK PUBLISHES WOODS’ FALSE STATEMENTS ON HIS BLOG ON**
13 **MARCH 1, 2019.**

14 15. At some point shortly after Elk emailed Trossman for a comment, on March 1,
15 2019, PayReport.com published an article, written by Elk, with the following headline:

16 **“EXCLUSIVE: SEIU VP Dave Regan Accused of Sexual Misconduct & Retaliating Against**
17 **Whistleblowers.”** (Emphasis in original). The article contained numerous false statements about
18 SEIU-UHW and Regan.

19 16. Based on statements from Woods, Elk alleged that SEIU-UHW and its staff
20 engaged in sexual favoritism, illegal Union electioneering, and “selling out members in backroom
21 deals with management.” Woods is directly quoted throughout the article, and appears to be the
22 sole source for Elk’s article.

23 17. In Elk’s March 1 article, Woods implies that Regan had sexual relations with
24 members and staff. Elk directly quotes Woods as saying, “It was widely discussed amongst
25 members that he [Regan] had sexual relations with members and staff.”

26 18. In the article, Woods also falsely accuses Regan of being drunk at work, and
27 smelling alcohol on his breath many times during the work day. Woods is directly quoted in
28 Elk’s March 1 article as saying that Regan “drinks all the time, everybody knows it He was
always drunk – it was just the norm.”

1 19. Woods describes the culture at SEIU-UHW as “toxic” and places the blame for
2 this on Regan’s “drinking and personal sexual misconduct.” Specifically, in the March 1 article,
3 Elk directly quotes Woods as stating that “the example set by Regan’s frequent drinking and
4 personal sexual misconduct created a toxic culture where many felt pressure to have sex in order
5 to get ahead.”

6 20. Woods also stated to Elk, in his March 1 article, that this “toxic culture” involved
7 frequent sexual exchanges for promotional opportunities. Woods is directly quoted as stating,
8 “It’s a sexual culture – it was all okay . . . The culture at that time was everybody was having sex
9 with everybody. That’s just the culture – sexual favors – that’s how people got ahead there.”

10 21. Woods also implies, through her statements to Elk, that SEIU-UHW is a racist
11 organization, and that her supervisors are racist. Woods is directly quoted in the March 1 article
12 as stating, “I faced racism at Riverside Community Hospital, but they addressed it at least,”
13 implying there were unaddressed issues with racism at SEIU-UHW. Woods is also directly
14 quoted as stating that her supervisor was “overheard by Woods [sic] co-workers in the office
15 saying ‘We are going to get that black bitch fired.’”

16 22. Woods also claims that Plaintiffs engaged in illegal electioneering; she falsely
17 stated to Elk that her supervisor forced her to donate and use personal time to assist Regan in his
18 re-election campaign in 2017.

19 23. Elk’s March 1 article also published falsehoods about SEIU-UHW’s advocacy on
20 behalf of healthcare workers, and its ability as a labor organization to assist healthcare workers
21 find their collective power in the workplace. For example, Elk directly quotes Woods as saying
22 that “if a member criticized SEIU Union leadership . . . her supervisor . . . was instructed to work
23 with union members’ employer to get that member fired.” Elk also attributes the following
24 statement to Woods: “Woods says that she felt pressure from SEIU not to fight management too
25 much and that sometimes SEIU would even instruct her to get a member fired if they questioned
26 SEIU’s lack of militancy[.]”

27 24. On March 5, 2019, SEIU-UHW met with Woods regarding the statements that she
28 made to Elk and that were posted on Elk’s blog. At this meeting, the Union provided Woods with

1 an opportunity to deny that she made any false and defamatory statements to Elk. Woods did not
2 deny that she made any of the statements attributed to her by Elk. Instead Woods refused to
3 answer any questions regarding her statements to Elk.

4 25. All of the statements attributed to Woods in paragraphs 12 through 23 are false,
5 and were made with a reckless disregard for the truth. Despite the inaccuracies of Woods'
6 statements, now published on the internet, she has not retracted any of her false statements about
7 SEIU-UHW and Regan.

8 **IV. FIRST CAUSE OF ACTION**
9 **Defamation – Slander Per Se – Cal. Civil Code § 46**
10 **(By Plaintiffs SEIU-UHW and Regan against Defendant Woods)**

11 26. Plaintiffs re-allege, and incorporate by reference paragraphs 1 through 25, above,
12 as though fully set forth herein.

13 27. The statements made by Woods to Elk, in paragraphs 12 through 23 are false; and
14 constitute an unscrupulous form of character assassination, consisting of nothing more than an
15 attack on the integrity, ethical character, and competence of SEIU-UHW and Regan.

16 28. Woods' statements to Elk are factually untrue and made with the intention to
17 mislead the public, through the PayDayreport.com article, about SEIU-UHW and Regan as well
18 as to undermine and discredit them.

19 29. The statements disseminated by Woods concern the ability of Plaintiffs to
20 competently execute the Union's mission to advocate on behalf of healthcare workers throughout
21 California. Spreading blatant falsehoods about sexual favoritism, public drunkenness, illegal
22 electioneering, and the failure to advocate on behalf of SEIU-UHW members is a shameless
23 attempt to smear and damage Plaintiffs' reputations among healthcare workers, patients and
24 healthcare consumers, and others within the labor community.

25 30. Woods' statements to Elk were designed to undercut the ability of Plaintiffs to
26 fulfill their mission of organizing and representing healthcare workers as members; and constitute
27 a blatant attempt, by Woods, to cast Plaintiffs in a most unfavorable light to the membership of
28 SEIU-UHW.

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1 31. Woods knowingly made these false statements to Elk, an internet blogger, without
2 any privilege, and knowing that the multiple false statements would be broadly disseminated to
3 the public-at-large.

4 32. Woods made these false statements to Elk without concern for the truth. All of the
5 statements referenced in paragraphs 12 through 23 involved Woods either knowing that the
6 information she provided was false or having a reckless disregard for the truth of her statements.

7 33. Woods disseminated the false information with the purpose and intent of causing
8 harm to Plaintiffs. Such conduct is of a malicious, oppressive, and fraudulent nature entitling the
9 Plaintiffs to an award for punitive damages.

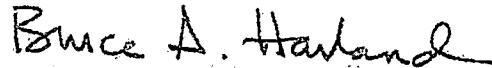
10 34. As a result of these statements, Plaintiffs have been harmed in their reputation.

11 WHEREFORE, Plaintiffs demand a trial by jury. Plaintiffs pray for judgment and relief
12 as follows:

- 13 1. Actual damages in an amount to be determined at trial;
- 14 2. Punitive damages in an amount sufficient to set an example for others;
- 15 3. Reasonable attorneys' fees, according to proof;
- 16 4. For costs of suit herein;
- 17 5. For interest on all sums awarded at the maximum amount allowable; and
- 18 6. For such other and further relief that the Court may deems just and proper.

19 Dated: March 21, 2019

WEINBERG, ROGER & ROSENFELD
A Professional Corporation



21 By: BRUCE A. HARLAND
22 MONICA T. GUIZAR
23 CHRISTINA L. ADAMS

24 Attorneys for SEIU-UHW and Dave Regan

25 N1016717

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): BRUCE A. HARLAND, Bar No. 230477 Weinberg, Roger & Rosenfeld, 1001 Marina Village Pkwy Ste 200 Alameda, CA 94501 MONICA T. GUIZAR, Bar No. 202480 / CHRISTINA L. ADAMS, Bar No. 325056 Weinberg, Roger & Rosenfeld, 800 Wilshire Blvd, Ste 1020, Los Angeles, CA 90017 TELEPHONE NO.: (510) 337-1001 FAX NO.: (510) 337-1023		FOR COURT USE ONLY	
ATTORNEY FOR (Name): Plaintiffs SEIU, UHW and Dave Regan			
SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE STREET ADDRESS: 4050 Main Street MAILING ADDRESS: 4050 Main Street CITY AND ZIP CODE: Riverside, Ca. 92501 BRANCH NAME: Riverside Historic Courthouse			
CASE NAME: SEIU, UHW, et al. v. Nioki Woods			
CIVIL CASE COVER SHEET <input checked="" type="checkbox"/> Unlimited (Amount demanded exceeds \$25,000) <input type="checkbox"/> Limited (Amount demanded is \$25,000 or less)		Complex Case Designation <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)	CASE NUMBER: <div style="font-size: 1.5em; font-weight: bold; text-align: center;">RIC 1902014</div>
		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:		
Auto Tort <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other PI/PD/WD (23) Non-PI/PD/WD (Other) Tort <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input checked="" 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) Employment <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	Contract <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) Real Property <input type="checkbox"/> Eminent domain/inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) Unlawful Detainer <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) Judicial Review <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)	Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403) <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) Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20) Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42) Miscellaneous Civil Petition <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)

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): **One: Defamation – Slander**
5. This case ☐ is ☒ is not a class action suit.
6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: **March 21, 2019**

Bruce A. Harland, Attorney

(TYPE OR PRINT NAME)

Bruce A. Harland

(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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By Fax

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 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

SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE
4050 Main Street
Riverside, CA 92501
www.riverside.courts.ca.gov

NOTICE OF DEPARTMENT ASSIGNMENT

SERVICE EMPLOYEES INTERNATIONAL UNION

CASE NO. RIC1902014

This case is assigned to the HONORABLE Judge Sunshine S Sykes in Department 06 for Law and Motion purposes only.

The case is assigned to Honorable Judge Irma Asberry in Department 1 for case management hearings (Case Management Conferences, Order to Show Causes, Status Conferences and Trial Setting Conferences).

Any disqualification pursuant to CCP section 170.6 shall be filed in accordance with that section.

The court follows California Rules of Court, Rule 3.1308(a)(1) for tentative rulings (see Riverside Superior Court Local Rule 3316). Tentative Rulings for each law and motion matter are posted on the Internet by 3:00 pm on the court day immediately before the hearing at <http://riverside.courts.ca.gov/tentativerulings.shtml>. If you do not have internet access, you may obtain the tentative ruling by telephone at (760) 904-5722.

To request oral argument, you must (1) notify the judicial secretary at (760) 904-5722 and (2) inform all other parties, no later than 4:30 pm the court day before the hearing. If no request for oral argument is made by 4:30 pm, the tentative ruling will become the final ruling on the matter effective the date of the hearing.

The filing party shall serve a copy of this notice on all parties.

Requests for accommodations can be made by submitting Judicial Council form MC-410 no fewer than five court days before the hearing. See California Rules of Court, rule 1.100.

CERTIFICATE OF MAILING

I certify that I am currently employed by the Superior Court of California, County of Riverside, and that I am not a party to this action or proceeding. In my capacity, I am familiar with the practices and procedures used in connection with the mailing of correspondence. Such correspondence is deposited in the outgoing mail of the Superior Court. Outgoing mail is delivered to and mailed by the United States Postal Service, postage prepaid, the same day in the ordinary course of business. I certify that I served a copy of the foregoing NOTICE on this date, by depositing said copy as stated above.

Court Executive Officer/Clerk

Date: 03/21/19

by:

ILZE SIRACUSA, Deputy Clerk

SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE
4050 Main Street
Riverside, CA 92501
www.riverside.courts.ca.gov

NOTICE OF CASE MANAGEMENT CONFERENCE

SERVICE EMPLOYEES INTERNATIONAL UNION VS WOODS

CASE NO. RIC1902014

The Case Management Conference is scheduled for 09/17/19 at 8:30 in Department 01.

No later than 15 calendar days before the date set for the case management conference or review, each party must file a case management statement and serve it on all other parties in the case. CRC, Rule 3.725.

The plaintiff/cross-complainant shall serve a copy of this notice on all defendants/cross-defendants who are named or added to the complaint and file proof of service.

Any disqualification pursuant to CCP Section 170.6 shall be filed in accordance with that section.

Requests for accommodations can be made by submitting Judicial Council form MC-410 no fewer than five court days before the hearing. See California Rules of Court, rule 1.100.

CERTIFICATE OF MAILING

I certify that I am currently employed by the Superior Court of California, County of Riverside, and that I am not a party to this action or proceeding. In my capacity, I am familiar with the practices and procedures used in connection with the mailing of correspondence. Such correspondence is deposited in the outgoing mail of the Superior Court. Outgoing mail is delivered to and mailed by the United States Postal Service, postage prepaid, the same day in the ordinary course of business. I certify that I served a copy of the foregoing NOTICE on this date, by depositing said copy as stated above.

Court Executive Officer/Clerk

Date: 03/21/19

by: _____
ILZE SIRACUSA, Deputy Clerk

