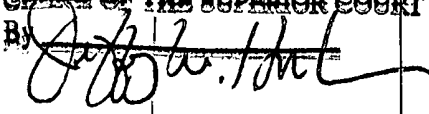




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PLD-PI-001

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Leonard S. Becker (SBN 113065) Jodie Steinberg (SBN 244708) Law Offices of Leonard S. Becker APN 1728 B Street, Hayward, CA 94541 TELEPHONE NO: 510-886-1996 FAX NO. (Optional): 510-538-8089 E-MAIL ADDRESS (Optional): lbecker@lsbeckerlaw.com ATTORNEY FOR (Name): Plaintiff Jermel Brown	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Alameda STREET ADDRESS: 24405 Amador Street MAILING ADDRESS: CITY AND ZIP CODE: Hayward 94544 BRANCH NAME: Hayward Hall of Justice	FILED ALAMEDA COUNTY DEC 31 2018
PLAINTIFF: Jermel Brown  DEFENDANT: Dr. Sebi Inc., Dr. Sebi's Office, LLC, Jenny Villasenor	CLERK OF THE SUPERIOR COURT By 
<input checked="" type="checkbox"/> DOES 1 TO 10  <b>COMPLAINT—Personal Injury, Property Damage, Wrongful Death</b> <input type="checkbox"/> AMENDED (Number): Type (check all that apply): <input checked="" type="checkbox"/> MOTOR VEHICLE <input checked="" type="checkbox"/> OTHER (specify): General Negligence <input type="checkbox"/> Property Damage <input type="checkbox"/> Wrongful Death <input checked="" type="checkbox"/> Personal Injury <input type="checkbox"/> Other Damages (specify):	
<b>Jurisdiction (check all that apply):</b> <input type="checkbox"/> ACTION IS A LIMITED CIVIL CASE Amount demanded <input type="checkbox"/> does not exceed \$10,000 <input type="checkbox"/> exceeds \$10,000, but does not exceed \$25,000 <input checked="" type="checkbox"/> ACTION IS AN UNLIMITED CIVIL CASE (exceeds \$25,000) <input type="checkbox"/> ACTION IS RECLASSIFIED by this amended complaint <input type="checkbox"/> from limited to unlimited <input type="checkbox"/> from unlimited to limited	CASE NUMBER:  <b>HG18001082</b>

- Plaintiff (name or names): Jermel Brown  
 alleges causes of action against defendant (name or names):  
 Dr. Sebi Inc., Dr. Sebi's Office, LLC, Jenny Villasenor and Does 1-10
- This pleading, including attachments and exhibits, consists of the following number of pages: 4
- Each plaintiff named above is a competent adult
  - except plaintiff (name):
    - a corporation qualified to do business in California
    - an unincorporated entity (describe):
    - a public entity (describe):
    - a minor  an adult
      - for whom a guardian or conservator of the estate or a guardian ad litem has been appointed
      - other (specify):
    - other (specify):
  - except plaintiff (name):
    - a corporation qualified to do business in California
    - an unincorporated entity (describe):
    - a public entity (describe):
    - a minor  an adult
      - for whom a guardian or conservator of the estate or a guardian ad litem has been appointed
      - other (specify):
    - other (specify):

Information about additional plaintiffs who are not competent adults is shown in Attachment 3.

SHORT TITLE: <b>Brown v. Dr. Sebi Inc.</b>	CASE NUMBER:
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4.  Plaintiff (name):  
 is doing business under the fictitious name (specify):

and has complied with the fictitious business name laws.

5. Each defendant named above is a natural person

- a.  **except** defendant (name): **Dr. Sebi Inc.**
- (1)  a business organization, form unknown
  - (2)  a corporation
  - (3)  an unincorporated entity (describe):
  - (4)  a public entity (describe):
  - (5)  other (specify):

- c.  **except** defendant (name): **Dr. Sebi's Office, LLC**
- (1)  a business organization, form unknown
  - (2)  a corporation
  - (3)  an unincorporated entity (describe):
  - (4)  a public entity (describe):
  - (5)  other (specify):

- b.  **except** defendant (name):
- (1)  a business organization, form unknown
  - (2)  a corporation
  - (3)  an unincorporated entity (describe):
  - (4)  a public entity (describe):
  - (5)  other (specify):

- d.  **except** defendant (name):
- (1)  a business organization, form unknown
  - (2)  a corporation
  - (3)  an unincorporated entity (describe):
  - (4)  a public entity (describe):
  - (5)  other (specify):

Information about additional defendants who are not natural persons is contained in Attachment 5.

6. The true names of defendants sued as Does are unknown to plaintiff.

- a.  Doe defendants (specify Doe numbers): 1-10 were the agents or employees of other named defendants and acted within the scope of that agency or employment.
- b.  Doe defendants (specify Doe numbers): 1-10 are persons whose capacities are unknown to plaintiff.

7.  Defendants who are joined under Code of Civil Procedure section 382 are (names):

8. This court is the proper court because

- a.  at least one defendant now resides in its jurisdictional area.
- b.  the principal place of business of a defendant corporation or unincorporated association is in its jurisdictional area.
- c.  injury to person or damage to personal property occurred in its jurisdictional area.
- d.  other (specify):

9.  Plaintiff is required to comply with a claims statute, and

- a.  has complied with applicable claims statutes, or
- b.  is excused from complying because (specify):

SHORT TITLE: Brown v. Dr. Sebi Inc.	CASE NUMBER:
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10. The following causes of action are attached and the statements above apply to each (*each complaint must have one or more causes of action attached*):

- a.  Motor Vehicle
- b.  General Negligence
- c.  Intentional Tort
- d.  Products Liability
- e.  Premises Liability
- f.  Other (*specify*):

11. Plaintiff has suffered

- a.  wage loss
- b.  loss of use of property
- c.  hospital and medical expenses
- d.  general damage
- e.  property damage
- f.  loss of earning capacity
- g.  other damage (*specify*):

To be proved.

12.  The damages claimed for wrongful death and the relationships of plaintiff to the deceased are

- a.  listed in Attachment 12.
- b.  as follows:

13. The relief sought in this complaint is within the jurisdiction of this court.

14. Plaintiff prays for judgment for costs of suit; for such relief as is fair, just, and equitable; and for

- a. (1)  compensatory damages
- (2)  punitive damages

The amount of damages is (*in cases for personal injury or wrongful death, you must check (1)*):

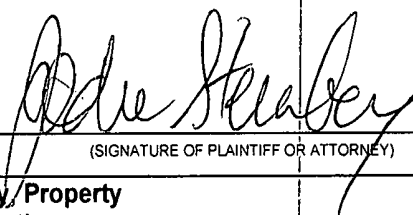
- (1)  according to proof
- (2)  in the amount of: \$

15.  The paragraphs of this complaint alleged on information and belief are as follows (*specify paragraph numbers*):

All capable of being so alleged

Date: December 21, 2018

Jodie Steinberg  
 \_\_\_\_\_  
 (TYPE OR PRINT NAME)

▶   
 \_\_\_\_\_  
 (SIGNATURE OF PLAINTIFF OR ATTORNEY)

SHORT TITLE: Brown v. Dr. Sebi Inc.	CASE NUMBER:
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First                      **CAUSE OF ACTION—General Negligence** Page   4    
 (number)

ATTACHMENT TO  Complaint  Cross - Complaint  
 (Use a separate cause of action form for each cause of action.)

GN-1. Plaintiff (name): Jermel Brown

alleges that defendant (name): Dr. Sebi Inc., Dr. Sebi's Office LLC, Jenny Villasenor and

Does   1   to   10  

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant negligently caused the damage to plaintiff

on (date): March 7, 2017

at (place): 900 143rd Avenue, #199, San Leandro, California

(description of reasons for liability):

On or about March 7, 2017, Plaintiff Jermel Brown purchased a hair follicle fortifier hair product from defendants and Does 1-10. On or about March 10, 2017, Plaintiff used the hair product as directed which caused Plaintiff's head to burn, swell up and double in size and also affected Plaintiff's vision.

Defendants, and each of them, negligently and carelessly disseminated, sold, administered, failed to warn and make sure their products were safe to use by the general public proximately causing injuries and damages as hereto set forth.

As a result of the negligence of the Defendants, and each of them, Plaintiff was injured in his health, strength and activity, sustaining injuries to his nervous system and person, all of which injuries have caused and will continue to cause Plaintiff great mental, emotional and physical pain and suffering. As a result of Plaintiff's injuries, he sustained damages for past, present and future medical treatment, together with loss of employment opportunity, the amount of which will be set forth in a sum according to proof.

As a further result of the negligence of Defendants, and each of them, Plaintiff has suffered general damages in a sum to be set forth according to proof.