

EXHIBIT A

FILED

Superior Court of California
County of Riverside

8/13/2020

D. Brown

Electronically Filed

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6 Attorneys for Plaintiff
ASHANTI MCMILLON

7
8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **COUNTY OF RIVERSIDE**

10
11 **ASHANTI MCMILLON**, an individual,

12 Plaintiff,

13 vs.

14 **THE REGENTS OF THE UNIVERSITY**
OF CALIFORNIA; a public entity; **SETSU**
15 **SHIGEMATSU**, an individual;
16 **DYLAN RODRIGUEZ**, an individual;
17 **S.T.R.O.N.G. EDUTAINMENT**, a
Nonprofit Public Benefit Corporation; and
18 **DOES 1-100**, inclusive,

19 Defendants.

Case No. RIC2003176

COMPLAINT FOR DAMAGES
FOR:

1. BREACH OF CONTRACT
2. NEGLIGENCE
3. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
4. LABOR CODES §1194; §1197; §203
5. COPYRIGHT INFRINGEMENT
6. MISAPPROPRIATION OF IMAGE AND LIKENESS
7. CONVERSION

UNLIMITED JURISDICTION

DEMAND FOR JURY TRIAL

20
21
22 **COMES NOW** Plaintiff **ASHANTI MCMILLON**, an individual, for causes of
23 action against Defendants, **THE REGENTS OF THE UNIVERSITY OF CALIFORNIA**,
24 a public entity; **SETSU SHIGEMATSU**, an individual; **DYLAN RODRIGUEZ**, an
25 individual; **S.T.R.O.N.G. EDUTAINMENT**, a Nonprofit Public Benefit Corporation; and
26 **DOES 1-100**, inclusive:
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GENERAL ALLEGATIONS

1. At all times herein relevant, Plaintiff ASHANTI MCMILLON, is a former student and alumni of the University of California at Riverside ("UCR"), and at all relevant times, was a resident of Riverside County in the State of California.
2. At all times herein relevant, Defendant THE REGENTS OF THE UNIVERSITY OF CALIFORNIA, was and is a public entity duly organized and existing under and by virtue of the laws of the State of California and authorized to do, and is doing, business in the State of California with its principal place of business in Alameda County in the State of California.
3. At all times relevant herein, THE REGENTS OF THE UNIVERSITY OF CALIFORNIA was, and is, responsible for providing an educational environment void of exploitation, harassment, discriminatory and predatory treatment from fellow students, faculty and staff, in compliance with the requirements of state and federal law.
4. Plaintiff is informed and believes, and thereupon alleges, that at all times herein relevant, Defendant SETSU SHIGEMATSU, was and is a resident of Riverside County, and was employed by and teaching at University of California at Riverside (hereinafter "UCR"). At all relevant times Defendant SHIGEMATSU was acting within the course and scope of her employment by UCR.
5. Plaintiff is informed and believes, and thereupon alleges, that at all times herein relevant, Defendant DYLAN RODRIGUEZ, was and is a resident of Riverside County, and was employed by and teaching at University of California at

1 Riverside (hereinafter "UCR"). At all relevant times Defendant RODRIGUEZ was
 2 acting within the course and scope of her employment by UCR.

3 6. Plaintiff is informed and believes, and thereupon alleges, that at all times
 4 relevant, Defendant DYLAN RODRIGUEZ is the chair of the Academic Senate of
 5 the UCR division and is part of the Media and Cultural Studies department. At all
 6 relevant times Defendant RODRIGUEZ was, and is, married to DEFENDANT
 7 SETSU SHIGEMATSU, and aware of Defendant SETSU SHIGEMATSU'S
 8 impermissible conduct within Plaintiff ASHANTI MCMILLON's complaint.
 9

10 7. Plaintiff is informed and believes, and thereupon alleges, that at all times
 11 herein relevant, Defendant S.T.R.O.N.G EDUTAINMENT, is a non-profit company
 12 under the control of, and owned and operated, by DEFENDANT SHIGEMATSU.
 13

14 8. Plaintiff is ignorant of the true names and capacities of the defendants herein
 15 as DOES 1 through 100, inclusive, therefore sues such defendants by such fictitious
 16 names. Plaintiff will seek to amend this Complaint to state their true names and
 17 capacities of said defendants when they have been ascertained. Plaintiff is informed
 18 and believes, and on that basis alleges, that each of the defendants designated herein
 19 as a DOE was in some manner responsible for the controversy at issue in this
 20 Complaint, occurrences and injuries alleged herein.
 21

22 9. Plaintiff is informed and believes, and thereupon alleges, that at all times
 23 mentioned herein, Defendant THE REGENTS OF THE UNIVERSITY OF
 24 CALIFORNIA was established under Article IX, Section 9 of the California
 25 Constitution to govern the affairs of its various campuses, including the University of
 26 California at Riverside ("UCR").
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 28

1 10. Plaintiff is informed and believes, and thereupon alleges that a public
2 employee has a statutory duty and is statutorily liable for injury caused by his act or
3 omission to the same extent as a private person would be, as provided by
4 Government Code Section 820(a).

5 11. Plaintiff is informed and believes, and thereupon alleges that Defendants
6 SETSU SHIGEMATSU AND DYLAN RODRIGUEZ, acting within the course and
7 scope of their employment with THE REGENTS OF THE UNIVERSITY OF
8 CALIFORNIA and UCR, and whose duties include teaching, supervising, assisting,
9 teaching and assisting in the supervision and control and safety of students on the
10 campus and in the classrooms, thereby establishing a special relationship with
11 students such as Plaintiff and others similarly situated, and creating an affirmative
12 duty to take reasonable steps to protect UCR students such as Plaintiff.

13 12. Plaintiff is informed and believes, and thereupon alleges that Defendant THE
14 REGENTS OF THE UNIVERSITY OF CALIFORNIA is liable for any breach of
15 said duty by its employees, agents, servants and/or joint ventures under the legal
16 theory of respondent superior, as provided under California Government Code
17 Sections 815.2 and 820.

18 13. On or about March 27, 2013 through June 14, 2013 Plaintiff ASHANTI
19 MCMILLON was a lawful student enrolled full time in academic programs at UCR,
20 enrolled in Defendant SHIGEMATSU's "MCS 190 Special Studies" course. On or
21 about June 24, 2013 to August 31, 2013 Plaintiff ASHANTI MCMILLON was a
22 lawful student enrolled part time in academic programs at UCR to complete final
23 undergraduate courses.

14. On or about March 27, 2013 through on or about February 1, 2015, Defendant SHIGEMATSU used her position as a Professor of UCR to induce Plaintiff ASHANTI MCMILLON, and other UCR students, to perform labor and personal services for Defendant SHIGEMATSU's personal, social and capital gain, on the UCR campus and using UCR campus resources and while under her course and scope of employment.

15. On or about March 27, 2013 through February 1, 2015, Defendant SHIGEMATSU used her position as a Professor of UCR to induce Plaintiff ASHANTI MCMILLON to write stories, songs and other works for Defendant SHIGEMATSU's personal, social and capital gain, on the UCR campus and using UCR campus resources and while under her course and scope of employment.

16. On or about March 18, 2018 through on or about February 21, 2020, Defendant THE REGENTS OF THE UNIVERSITY OF CALIFORNIA knew about the unlawful activities of Defendant SHIGEMATSU.

17. Defendant SETSU SHIGEMATSU uses, and continues to use, Plaintiff ASHANTI MCMILLON'S image, likeness and copywritten works without Plaintiff ASHANTI MCMILLON'S consent, and without adequate or proper compensation paid to Plaintiff ASHANTI MCMILLON.

FIRST CAUSE OF ACTION
(BREACH OF CONTRACT- FRAUD/MISREPRESENTATION)

By Plaintiff ASHANTI MCMILLON against Defendants THE REGENTS OF THE UNIVERSITY OF CALIFORNIA, SETSU SHIGEMATSU, DYLAN RODRIGUEZ and DOES 1 through 100, inclusive

18. Plaintiff realleges and incorporates by reference each and every allegation and statement contained in the prior paragraphs.

1 19. Plaintiff is informed and believes, thereupon alleges, that at all times
2 mentioned herein Defendant SETSU SHIGEMATSU used deceptive, false and
3 misleading oral and written representations, while under her course and scope of
4 employment to induce Plaintiff to create works and write storybooks and songs for
5 Defendant Shigematsu's for-profit company, "Guardian Princess Alliance, LLC"
6 without proper compensation.
7

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9 20. Plaintiff is informed and believes, thereupon alleges, that at all times mentioned
10 herein Defendant SETSU SHIGEMATSU grossly misused the UCR course "MCS
11 190 Special Studies." The course is designed to provide students the opportunity to
12 earn course credits by developing their own creative project or final paper.
13 DEFENDANT SHIGEMATSU used this academic course to obtain free student
14 labor to jumpstart capital, resources, and content for her own company. Defendant
15 SETSU SHIGEMATSU made false representations and promises to Plaintiff and
16 other students that they would receive royalties, future compensation, and reach top
17 level, lucrative positions in the company. DEFENDANT SHIGEMATSU
18 intentionally used course credits as leverage to exploit, harass, and bully Plaintiff and
19 other students.
20
21

22 21. Plaintiff is informed and believes, thereupon alleges, that at all times mentioned
23 herein Defendant SETSU SHIGEMATSU induced Plaintiff to create works with the
24 promise of adequate and proper financial compensation, as well as future financial
25 compensation and royalties for the sales of Plaintiff's works.
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1 22. Plaintiff is informed and believes, thereupon alleges, that at all times
2 mentioned herein Defendant SETSU SHIGEMATSU failed to compensate Plaintiff
3 for her works, as promised. At all times mentioned herein, Defendant SETSU
4 SHIGEMATSU failed to provide financial compensation and royalties adequately
5 and properly to Plaintiff for the sales of Plaintiff's works.
6

7 23. Plaintiff is informed and believes, thereupon alleges, that at all times
8 mentioned herein Defendant SETSU SHIGEMATSU induced Plaintiff in becoming a
9 business partner in "Guardian Princess Alliance, LLC" with the oral and written
10 promise of owning the company in its entirety. Defendant SETSU SHIGEMATSU
11 also used the aforementioned promises to induce Plaintiff ASHANTI MCMILLON
12 to provide labor without adequate or proper compensation, for the benefit of
13 Defendant SETSU SHIGEMATSU'S for profit company "Guardian Princess
14 Alliance, LLC."
15

16 24. Plaintiff is informed and believes, thereupon alleges, that at all times
17 mentioned herein Defendant SETSU SHIGEMATSU failed to fulfill oral and written
18 promises of business ownership and management upon the company's inception and
19 profitability.
20

21 25. As a direct and proximate result of the above-mentioned wrongful conduct of
22 Defendant SETSU SHIGEMATSU, Plaintiff ASHANTI MCMILLON suffered
23 actual damages and serious injuries including but not limited to, mental anguish,
24 anxiety, and emotional distress.
25

26 ///

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28

SECOND CAUSE OF ACTION
(NEGLIGENCE)

**By Plaintiff ASHANTI MCMILLON against Defendants THE
REGENTS OF THE UNIVERSITY OF CALIFORNIA, SETSU
SHIGEMATSU, DYLAN RODRIGUEZ, S.T.R.O.N.G EDUTAINMENT
and DOES 1 through 100, inclusive**

26. Plaintiff realleges and incorporates by reference each and every allegation and statement contained in the prior paragraphs.

27. Plaintiff is informed and believes, and thereupon alleges, that at all times mentioned herein, Defendants THE REGENTS OF THE UNIVERSITY OF CALIFORNIA, and its employees including Defendants SETSU SHIGEMATSU and DYLAN RODRIGUEZ, S.T.R.O.N.G EDUTAINMENT and DOES 1-100, inclusive, and each of them, having invited Plaintiff ASHANTI MCMILLON onto the campus property and having enrolled her as a student in exchange for the payment of tuition, has a special relationship existing with Plaintiff wherein they had a statutory duty under Government Code Sections 815.2 and 820 to take reasonable protective measures to endure her safety against abusive conduct and otherwise protect her from reasonably foreseeable criminal conduct on its campus and in its buildings, and/or to control the reasonably foreseeable wrongful acts of third parties.

28. Plaintiff is informed and believes, and thereupon alleges, that at all times mentioned herein, Defendants THE REGENTS OF THE UNIVERSITY OF CALIFORNIA, and its employees including Defendants SETSU SHIGEMATSU and DYLAN RODRIGUEZ and administrators, teachers, professors, assistant professors, agents/employees, and/or students at UCR had personal knowledge of Defendant SETSU SHIGEMATSU'S was using, had used, and is still using, her position as a

1 Professor at UCR, under her course and scope of employment, to induce her students
 2 to provide free labor for Defendant SETSU SHIGEMATSU'S personal, social and
 3 capital gain.

4 29. Plaintiff is informed and believes, and thereupon alleges, that at all times
 5 mentioned herein, Defendants THE REGENTS OF THE UNIVERSITY OF
 6 CALIFORNIA, and its employees including Defendants SETSU SHIGEMATSU and
 7 DYLAN RODRIGUEZ and administrators, teachers, professors, assistant professors,
 8 agents/employees, and/or students at UCR had knowledge of the exploitive conduct
 9 of Defendant SETSU SHIGEMATSU prior to March 27, 2013, and upon learning of
 10 the abuse and exploitation occurring within Defendant SETSU SHIGEMATSU'S
 11 failed to warn its students, and/or control the reasonably foreseeable wrongful acts of
 12 Defendant SETSU SHIGEMATSU.
 13

14 30. Plaintiff is informed and believes, and thereupon alleges, that at all times
 15 mentioned herein, Defendants THE REGENTS OF THE UNIVERSITY OF
 16 CALIFORNIA, and its employees including Defendants SETSU SHIGEMATSU and
 17 DYLAN RODRIGUEZ, and DOES 1-100, inclusive, and each of them, breached
 18 their duty to take reasonable protective measures to ensure Plaintiff's safety against
 19 exploitive tactics. Labor abuse, and/or to control the reasonably foreseeable wrongful
 20 acts of third parties.
 21

22 31. As a direct and proximate result of the above-mentioned wrongful conduct of
 23 Defendants THE REGENTS OF THE UNIVERSITY OF CALIFORNIA, SETSU
 24 SHIGEMATSU, DYLAN RODRIGUEZ, S.T.R.O.N.G EDUTAINMENT, and
 25 DOES 1-100, inclusive, and each of them, Plaintiff ASHANTI MCMILLON
 26
 27
 28

1 suffered actual damages and serious injuries including but not limited to, mental
2 anguish, anxiety, and emotional distress.

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4 **THIRD CAUSE OF ACTION**
5 **(INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS)**

6 **By Plaintiff ASHANTI MCMILLON Against Defendant SETSU**
7 **SHIGEMATSU and DOES 1-100, inclusive**

8 32. Plaintiff realleges and incorporates by reference each and every allegation
9 and statement contained in the prior paragraphs.

10 33. On or about March 27, 2013 - May 18, 2020, Defendant SETSU
11 SHIGEMATSU and DOES 1 through 100, inclusive, and each of them, acted
12 intentionally and/or with reckless disregard for the likelihood of causing emotional
13 distress by engaging in abusive and exploitive conduct that are beyond all possible
14 bounds of decency as a Professor and are utterly intolerable in a civilized society and
15 educational environment. Defendant knew or should have known that by engaging in
16 said outrageous conduct, Plaintiff ASHANTI MCMILLON would likely suffer
17 severe and extreme anxiety, anguish, and distress.

18 34. As a direct and proximate cause of the above-mentioned outrageous conduct
19 of Defendant SETSU SHIGEMATSU and DOES 1-100, inclusive and each of them,
20 Plaintiff suffers and continues to suffer from severe and debilitating emotional
21 distress, anxiety, anguish, and depression requiring treatment and counseling.

22 35. The above acts were done by Defendant SETSU SHIGEMATSU and DOES
23 1-100, inclusive, and each of them, with malice and with the intent to cause severe
24 emotional distress, justifying the awarding of punitive damages within the
25 jurisdiction of this Court.
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FOURTH CAUSE OF ACTION
(LABOR CODE SECTIONS §1194; §1197; §203)

**By Plaintiff ASHANTI MCMILLON against Defendants THE
REGENTS OF THE UNIVERSITY OF CALIFORNIA, SETSU
SHIGEMATSU, DYLAN RODRIGUEZ, S.T.R.O.N.G EDUTAINMENT
and DOES 1 through 100, inclusive**

36. Plaintiff realleges and incorporates by reference each and every allegation and statement contained in the prior paragraphs.

37. Plaintiff is informed and believes, and thereupon alleges, that at all times mentioned herein, Defendants THE REGENTS OF THE UNIVERSITY OF CALIFORNIA, and its employees including Defendants SETSU SHIGEMATSU and DYLAN RODRIGUEZ and administrators, teachers, professors, assistant professors, agents/employees, used Plaintiff ASHANTI MCMILLON and other UCR students to perform labor and provide work(s) for the personal benefit of Defendant SETSU SHIGEMATSU'S for-profit company "Guardian Princess Alliance, LLC". At all times alleged herein, Defendant SETSU SHIGEMATSU induced labor from Plaintiff without adequate, fair or proper compensation, under the guise of a school project.

38. As a direct and proximate result of the above-mentioned wrongful conduct of Defendants THE REGENTS OF THE UNIVERSITY OF CALIFORNIA, SETSU SHIGEMATSU, DYLAN RODRIGUEZ, S.T.R.O.N.G EDUTAINMENT, and DOES 1-100, inclusive, and each of them, Plaintiff ASHANTI MCMILLON suffered actual damages and serious injuries including but not limited to, mental anguish, anxiety, and emotional distress.

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FIFTH CAUSE OF ACTION
(COPYRIGHT INFRINGEMENT PER 17 U.S. Code §501)

**By Plaintiff ASHANTI MCMILLON against Defendants THE
REGENTS OF THE UNIVERSITY OF CALIFORNIA, SETSU
SHIGEMATSU, DYLAN RODRIGUEZ, S.T.R.O.N.G EDUTAINMENT
and DOES 1 through 100, inclusive**

39. Plaintiff realleges and incorporates by reference each and every allegation and statement contained in the prior paragraphs.

40. Plaintiff is informed and believes, and thereupon alleges, that at all times mentioned herein, Defendants THE REGENTS OF THE UNIVERSITY OF CALIFORNIA, and its employees including Defendants SETSU SHIGEMATSU and DYLAN RODRIGUEZ, S.T.R.O.N.G EDUTAINMENT, and DOES 1-100, inclusive, and administrators sold and advertised, and continues to do so, Plaintiff's copyrighted storybooks, "*Princess Mariana and Lixo Island*" and "*Princess Vinnea and the Gulavores*," on Amazon, the Guardian Princess website and social media without Plaintiff's permission and/or adequate, fair and proper compensation.

41. Plaintiff is informed and believes, and thereupon alleges, that at all times mentioned herein, Defendants S.T.R.O.N.G. EDUTAINMENT is owned and operated by Defendant SETSU SHIGEMATSU and Defendant DYLAN RODRIGUEZ, with its corporate address located at 3122 900 University Ave., Riverside, CA. 92521, and 24417 Wasatch Court, Corona, CA. 92883. Plaintiff is informed and believes, and thereupon alleges, that at all times mentioned herein, that the address 3122 900 University Ave., Riverside, CA. 92521 is located on the UCR campus, and the address 24417 Wasatch Court, Corona, CA. 92883 is the residence of Defendant SETSU SHIGEMATSU and Defendant DYLAN RODRIGUEZ.

1 42. Plaintiff is informed and believes, and thereupon alleges, that at all times
 2 mentioned herein, Defendants THE REGENTS OF THE UNIVERSITY OF
 3 CALIFORNIA, and its employees including Defendants SETSU SHIGEMATSU and
 4 DYLAN RODRIGUEZ, S.T.R.O.N.G EDUTAINMENT, and DOES 1-100,
 5 inclusive, and administrators continues to advertise Plaintiff's copyrighted song
 6 titled "*My Heart is True*" featured in a music video on the Guardian Princess website
 7 and YouTube profile without Plaintiff's permission.

9 43. Plaintiff is informed and believes, thereupon alleges, that at all times
 10 mentioned herein, on or about June 17, 2016, Defendant SETSU SHIGEMATSU
 11 infringed on the copyright of Plaintiff ASHANTI MCMILLON by registering works
 12 attributable to Plaintiff. At all times mentioned herein, Defendant SETSU
 13 SHIGEMATSU did not seek Plaintiff's permission or provide Plaintiff compensation
 14 for the continued use and publications of Plaintiff's works.

16 44. As a direct and proximate result of the above-mentioned wrongful conduct of
 17 Defendants THE REGENTS OF THE UNIVERSITY OF CALIFORNIA, SETSU
 18 SHIGEMATSU, DYLAN RODRIGUEZ, S.T.R.O.N.G EDUTAINMENT, and
 19 DOES 1-100, inclusive, and each of them, Plaintiff ASHANTI MCMILLON
 20 suffered actual damages and serious injuries including but not limited to, mental
 21 anguish, anxiety, and emotional distress.
 22
 23

24 **SIXTH CAUSE OF ACTION**
 25 **(MISAPPROPRIATION OF IMAGE AND LIKENESS Cal. Civ. Code §3344)**

26 **By Plaintiff ASHANTI MCMILLON against Defendants SETSU**
 27 **SHIGEMATSU, DYLAN RODRIGUEZ, S.T.R.O.N.G EDUTAINMENT and**
 28 **DOES 1 through 100, inclusive**

1 45. Plaintiff realleges and incorporates by reference each and every allegation
2 and statement contained in the prior paragraphs.

3 46. Plaintiff is informed and believes, and thereupon alleges, that at all times
4 mentioned herein, Defendants SETSU SHIGEMATSU and DYLAN RODRIGUEZ,
5 S.T.R.O.N.G EDUTAINMENT, and DOES 1-100, inclusive, and each of them,
6 violated Plaintiff's image and likeness under Cal. Civ. Code §3344, as follows:
7

8 a. Defendant SETSU SHIGEMATSU used Plaintiff ASHANTI MCMILLON'S
9 likeness for the illustrations of the Black Princess character within Plaintiff's
10 copyrighted book, "*Princess Vinnea and the Gulavores*," without Plaintiff's
11 permission and/or providing Plaintiff compensation.
12

13 b. Defendant SETSU SHIGEMATSU advertised, and continues to advertise the
14 music video containing Plaintiff's copyrighted song, "*My Heart is True*," in
15 which Plaintiff dresses and acts as "*Princess Vinnea*" on the Guardian
16 Princess YouTube channel, without Plaintiff's permission and/or providing
17 Plaintiff compensation.
18

19 47. As a direct and proximate result of the above-mentioned wrongful conduct of
20 Defendants THE REGENTS OF THE UNIVERSITY OF CALIFORNIA, SETSU
21 SHIGEMATSU, DYLAN RODRIGUEZ, S.T.R.O.N.G EDUTAINMENT, and
22 DOES 1-100, inclusive, and each of them, Plaintiff ASHANTI MCMILLON
23 suffered actual damages and serious injuries including but not limited to, mental
24 anguish, anxiety, and emotional distress.
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SEVENTH CAUSE OF ACTION
(CONVERSION PER CAL. CIV. CODE §3336)

By Plaintiff ASHANTI MCMILLON against Defendants SETSU SHIGEMATSU, DYLAN RODRIGUEZ, S.T.R.O.N.G EDUTAINMENT and DOES 1 through 100, inclusive

48. Plaintiff realleges and incorporates by reference each and every allegation and statement contained in the prior paragraphs.

49. Plaintiff is informed and believes, and thereupon alleges, that at all times mentioned herein, Defendants SETSU SHIGEMATSU and DYLAN RODRIGUEZ, S.T.R.O.N.G EDUTAINMENT, and DOES 1-100, inclusive, and each of them, committed conversion against Plaintiff in violation of Cal. Civ. Code §3336, through the following conduct:

a. Defendant SETSU SHIGEMATSU and DEFENDANT S.T.R.O.N.G EDUTAINMENT has derived, and continues to derive personal, social, and monetary benefits from the unpermitted use and sale of Plaintiff's copyrighted storybooks, "*Princess Mariana and Lixo Island*" and "*Princess Vinnea and the Gulavores*."

b. Defendant SETSU SHIGEMATSU and DEFENDANT S.T.R.O.N.G EDUTAINMENT derived, and continues to derive personal, social, and monetary benefits from the unpermitted use and advertisement of Plaintiff's copyrighted song, "*My Heart is True*" on the Guardian Princess YouTube channel.

50. As a direct and proximate result of the above-mentioned wrongful conduct of Defendants THE REGENTS OF THE UNIVERSITY OF CALIFORNIA, SETSU SHIGEMATSU, DYLAN RODRIGUEZ, S.T.R.O.N.G EDUTAINMENT, and

DOES 1-100, inclusive, and each of them, Plaintiff ASHANTI MCMILLON suffered actual damages and serious injuries including but not limited to, mental anguish, anxiety, and emotional distress.

PRAYER FOR RELIEF


WHEREFORE, Plaintiff requests that judgment be entered in her favor against the Defendants as follows:

1. For general damages in an amount in excess of the jurisdictional minimum according to proof;
2. For medical, professional, and incidental expenses in excess of the jurisdictional minimum, according to proof;
3. For loss of earnings, loss of opportunity, and loss of earning capacity in excess if the jurisdictional minimum, according to proof;
4. For economic damages related thereto, according to proof;
5. For costs of suit incurred herein;
6. For punitive damages against Defendant SETSU SHIGEMATSU and;
7. For such other and further relief as the Court may deem just and proper.

Respectfully submitted,

DATED: August 13, 2020

by: WALLENIOUS LAW GROUP

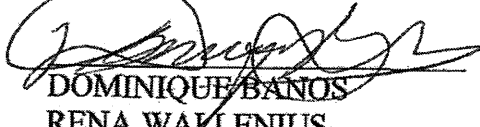

DOMINIQUE BANOS
RENA WALLENIOUS
Attorneys for Plaintiff
Ashanti McMillon

DEMAND FOR TRIAL BY JURY

Plaintiff hereby demands trial by jury as to all causes of action.

DATED: August 13, 2020

by: WALLENIOUS LAW GROUP


DOMINIQUE BANOS
RENA WALLENIOUS
Attorneys for Plaintiff
Ashanti McMillon

VERIFICATION

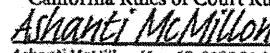
(CCP§§446, 1116, 2015.5)

I, Ashanti McMillon, declare,

I am the Plaintiff in this Complaint. I am familiar with the facts of this matter and therefore authorized to sign this verification for the above-entitled action. I have read the foregoing complaint and know the contents therein; and the same is true of my own knowledge, except as to the matters which are therein stated upon information and belief, and as to those matters, I believe them to be true.

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

DATED: August 13, 2020

Electronic signature per
California Rules of Court Rule 2.257

Ashanti McMillon (Aug 13, 2020 21:31 PDT)

Ashanti McMillon
Plaintiff & Declarant

SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE

- ☐ BANNING 311 E. Ramsey St., Banning, CA 92220
☐ BLYTHE 265 N. Broadway, Blythe, CA 92225
☐ CORONA 505 S. Buena Vista, Rm. 201, Corona, CA 92882
☐ HEMET 880 N. State St., Hemet, CA 92543
☐ MORENO VALLEY 13800 Heacock St., Ste. D201, Moreno Valley, CA 92553
- ☐ MURRIETA 30755-D Auld Rd., Suite 1226, Murrieta, CA 92563
☐ PALM SPRINGS 3255 E. Tahquitz Canyon Way, Palm Springs, CA 92262
☒ RIVERSIDE 4050 Main St., Riverside, CA 92501
☐ TEMECULA 41002 County Center Dr., #100, Temecula, CA 92591

RI-CI032

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar Number and Address) Rena Wallenius [SBN: 89798] Dominique E. Banos [SBN: 309062] 3186 Vista Way, Suite 300 Oceanside, CA. 92056 TELEPHONE NO: (760) 889-0793 FAX NO. (949) 301-2786 E-MAIL ADDRESS (Optional): RenaWallenius@gmail.com ATTORNEY FOR (Name): Ashanti McMillon		FOR COURT USE ONLY FILED Superior Court of California County of Riverside 8/13/2020 D. Brown Electronically Filed
PLAINTIFF/PETITIONER: Ashanti McMillon DEFENDANT/RESPONDENT: The Regents of the University of California, et. al.		
CASE NUMBER: RIC2003176		
CERTIFICATE OF COUNSEL		

The undersigned certifies that this matter should be tried or heard in the court identified above for the reasons specified below:

☒ The action arose in the zip code of: 92521

☐ The action concerns real property located in the zip code of: _____

☐ The Defendant resides in the zip code of: _____


For more information on where actions should be filed in the Riverside County Superior Courts, please refer to Local Rule 1.0015 at www.riverside.courts.ca.gov.

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

Date 08/13/2020

Dominique E. Banos

(TYPE OR PRINT NAME OF ☒ ATTORNEY ☐ PARTY MAKING DECLARATION)


 (SIGNATURE)

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

NOTICE OF DEPARTMENT ASSIGNMENT FOR ALL PURPOSES
AND NOTICE OF CASE MANAGEMENT CONFERENCE

McMillon vs The Regents of the University of CA

CASE NO. RIC2003176

This case is assigned to the Honorable Judge Carol A Greene in Department 02 for all purposes, including trial.

The Case Management Conference is scheduled for 02/09/21 at 8:30 in Department 02.

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. 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://www.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, not later than 4:30 pm on the court day before the hearing you must (1) notify the judicial secretary at (760)904-5722 and (2) inform all other parties. 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.

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: 08/17/20

by:



DAWN M BROWN, Deputy Clerk