

# SUMMONS (CITACION JUDICIAL)

## NOTICE TO DEFENDANT: (AVISO AL DEMANDADO):

City of Ojai, a public entity; DOES 1 through 50, inclusive  
Received City of Ojai

## YOU ARE BEING SUED BY PLAINTIFF: (LO ESTÁ DEMANDANDO EL DEMANDANTE):

Renee Mora, an individual

JUL 18 2025

City Clerk

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

## ELECTRONICALLY FILED

Superior Court of California  
County of Ventura

06/23/2025

K. Bieker  
Executive Officer and Clerk

By: Joan Foster Deputy Clerk  
Joan Foster

**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):

Ventura Hall of Justice  
800 South Victoria Avenue  
Ventura 93009

CASE NUMBER:  
(Número del Caso):

2025CUWT046231

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):

Johnny Rundell (SBN 289480) (310) 929-2190 K. Bieker  
16255 Ventura Blvd., Suite 1205 Encino, CA 91436

DATE:  
(Fecha) 06/23/2025

Clerk, by Joan Foster, Deputy  
(Secretario) Joan Foster (Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)

(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).

[SEAL]



**NOTICE TO THE PERSON SERVED:** You are served

1. ☐ as an individual defendant.
2. ☐ as the person sued under the fictitious name of (specify):


3. ☒ on behalf of (specify): City of Ojai, a public entity

- under: ☐ CCP 416.10 (corporation) ☐ CCP 416.60 (minor)  
☐ CCP 416.20 (defunct corporation) ☐ CCP 416.70 (conservatee)  
☐ CCP 416.40 (association or partnership) ☐ CCP 416.90 (authorized person)  
☒ other (specify): 416.50 (public entity)

4. ☐ by personal delivery on (date):

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):  
**Johnny Rundell 289480**  
**Hershey Law, P.C.**  
**16255 Ventura Blvd., Suite 1205 Encino, CA 91436**  
 TELEPHONE NO.: (310) 929-2190 FAX NO. (Optional): (818) 301-4918  
 E-MAIL ADDRESS: [jrundell@hersheyaw.com](mailto:jrundell@hersheyaw.com)  
 ATTORNEY FOR (Name): Plaintiff, Renee Mora

FOR COURT USE ONLY  
**ELECTRONICALLY FILED**  
 Superior Court of California  
 County of Ventura  
 06/23/2025  
 K. Bieker  
 Executive Officer and Clerk

By:  Deputy Clerk  
 Joan Foster

**SUPERIOR COURT OF CALIFORNIA, COUNTY OF VENTURA**

STREET ADDRESS: 800 South Victoria Avenue  
 MAILING ADDRESS: 800 South Victoria Avenue  
 CITY AND ZIP CODE: Ventura 93009  
 BRANCH NAME: Ventura Hall of Justice

**CASE NAME:**

**Mora v. City of Ojai, et al**

**CIVIL CASE COVER SHEET**

☒ **Unlimited** (Amount demanded exceeds \$25,000)  
☐ **Limited** (Amount demanded is \$25,000 or less)

**Complex Case Designation**

☐ Counter ☐ Joinder  
 Filed with first appearance by defendant  
 (Cal. Rules of Court, rule 3.402)

CASE NUMBER:

**2025CUWT046231**

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**

☐ Auto (22)  
☐ Uninsured motorist (46)

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

☐ Asbestos (04)  
☐ Product liability (24)  
☐ Medical malpractice (45)  
☐ Other PI/PD/WD (23)

**Non-PI/PD/WD (Other) Tort**

☐ Business tort/unfair business practice (07)  
☐ Civil rights (08)  
☐ Defamation (13)  
☐ Fraud (16)  
☐ Intellectual property (19)  
☐ Professional negligence (25)  
☐ Other non-PI/PD/WD tort (35)

**Employment**

☒ Wrongful termination (36)  
☐ Other employment (15)

**Contract**

☐ Breach of contract/warranty (06)  
☐ Rule 3.740 collections (09)  
☐ Other collections (09)  
☐ Insurance coverage (18)  
☐ Other contract (37)

**Real Property**

☐ Eminent domain/Inverse condemnation (14)  
☐ Wrongful eviction (33)  
☐ Other real property (26)

**Unlawful Detainer**

☐ Commercial (31)  
☐ Residential (32)  
☐ Drugs (38)

**Judicial Review**

☐ Asset forfeiture (05)  
☐ Petition re: arbitration award (11)  
☐ Writ of mandate (02)  
☐ Other judicial review (39)

**Provisionally Complex Civil Litigation**  
 (Cal. Rules of Court, rules 3.400–3.403)

☐ Antitrust/Trade regulation (03)  
☐ Construction defect (10)  
☐ Mass tort (40)  
☐ Securities litigation (28)  
☐ Environmental/Toxic tort (30)  
☐ Insurance coverage claims arising from the above listed provisionally complex case types (41)

**Enforcement of Judgment**

☐ Enforcement of judgment (20)

**Miscellaneous Civil Complaint**

☐ RICO (27)  
☐ Other complaint (not specified above) (42)

**Miscellaneous Civil Petition**

☐ Partnership and corporate governance (21)  
☐ Other petition (not specified above) (43)

2. 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. ☐ Large number of separately represented parties d. ☐ Large number of witnesses  
 b. ☐ Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve e. ☐ Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court  
 c. ☐ Substantial amount of documentary evidence f. ☐ Substantial postjudgment judicial supervision

3. Remedies sought (check all that apply): a. ☒ monetary b. ☒ nonmonetary; declaratory or injunctive relief c. ☒ punitive

4. Number of causes of action (specify): 9

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: 06/23/2025

Johnny Rundell

(TYPE OR PRINT NAME)

**NOTICE**

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

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**JUL 18 2025**

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- 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.

**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 Claim  
Other Civil Petition

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K. Bieker

Executive Officer and Clerk

By: Joan Foster Deputy Clerk

Joan Foster

Brennan Hershey (SBN: 311464)

Johnny Rundell (SBN: 289480)

**HERSHEY LAW, P.C.**

16255 Ventura Blvd, Suite 1205

Encino, CA 91436

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Attorneys for Plaintiff RENEE MORA

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**FOR THE COUNTY OF VENTURA**

RENEE MORA, an individual,

Plaintiff,

vs.

CITY OF OJAI, a public entity, and DOES 1  
through 50, inclusive.

Defendants.

Case No. 2025CUWT046231

**PLAINTIFF'S COMPLAINT FOR DAMAGES**

1. Discrimination on the Basis of Medical Condition in Violation of the FEHA.
2. Discrimination on the Basis of Race in Violation of the FEHA.
3. Failure to Make a Reasonable Accommodation.
4. Failure to Prevent Discrimination in Violation of the FEHA.
5. Retaliation in Violation of the FEHA.
6. Whistleblower Retaliation in Violation of Labor Code § 1102.5.
7. Wrongful Termination in Violation of the FEHA.
8. Wrongful Termination in Violation of Public Policy.
9. Retaliation in Violation of Labor Code § 6310.

**DEMAND FOR JURY TRIAL**

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1 **COMPLAINT FOR DAMAGES**

2 Plaintiff, Renee Mora, alleges on the basis of personal knowledge and/or information and  
3 belief:

4 **SUMMARY**

5 This is an action by Plaintiff, Renee Mora, ("Mora"), against City of Ojai, ("City of  
6 Ojai") and Defendant DOES 1 through 50, inclusive, hereafter collectively referred to as  
7 "Defendants".

8 This case exemplifies how a dedicated employee faced retaliation and wrongful  
9 termination after standing up against workplace safety violations and supporting her supervisor  
10 who enforced proper policies and procedures. Plaintiff brings this action against Defendants for  
11 economic, non-economic, compensatory, and pre-judgment interest pursuant to Code of Civil  
12 Procedure section § 3291, and costs and reasonable attorneys' fees pursuant to Government Code  
13 section § 12965(b) and Code of Civil Procedure section § 1021.5.

14 **PARTIES**

15 1. *Plaintiff:* Plaintiff Mora is, and at all times mentioned in this Complaint was, a  
16 resident of the County of Ventura, California.

17 2. *Defendant:* Defendant City of Ojai is, and at all times in this Complaint was,  
18 authorized to operate by the State of California and the United States government and authorized  
19 and qualified to do business in the County of Ventura. City of Ojai's principal place of business,  
20 where the following causes of action took place, was and is located in the County of Ventura at  
21 401 South Ventura Street, Ojai, California 92023.

22 3. *Doe Defendants:* DOES 1 to 50, inclusive, are sued under fictitious names  
23 pursuant to Code of Civil Procedure section § 474. Plaintiff is informed and believes, and on that  
24 basis alleges, and on that basis alleges, that each of the Defendants sued under fictitious names  
25 are in some manner responsible for the wrongs and damages alleged below, in so acting were  
26 functioning as the agents, servants, partners, and employees of the Co-Defendants, and in taking  
27 the actions mentioned below were acting within the course and scope of their authority as such  
28 agent, servant, partner, and employee, with the permission and consent of the co-defendants. The

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1 named Defendants and DOE Defendants are sometimes hereafter referred to, collectively and/or  
2 individually, as "Defendants".

3 4. *Relationship of Defendants:* All Defendants compelled, coerced, aided, and/or  
4 abetted the retaliation and harassment alleged in this Complaint, which conduct is prohibited  
5 under California Government Code section § 12940(i). All Defendants were responsible for the  
6 events and damages alleged herein, including on the following bases: (a) Defendants, committed  
7 the acts alleged; (b) at all relevant times, one or more of the Defendants was the agent or  
8 employee, and/or acted under the control or supervision, of one or more of the remaining  
9 defendants, and in committing the acts alleged, acted within the course and scope of such agency  
10 and employment and/or is or are otherwise liable for Plaintiff's damages. Defendants exercised  
11 domination and control over one another to such an extent that any individuality or separateness  
12 of Defendants, does not, and at all times herein mentioned did not, exist. Adherence to the fiction  
13 of the separate existence of Defendants would permit abuse of the corporate privilege and would  
14 sanction fraud and promote injustice. All actions of all defendants were taken by employees,  
15 supervisors, executives, officers, and directors during employment with all Defendants, were  
16 taken on behalf of all Defendants, and were engaged in, authorized, ratified, and approved of by  
17 all other Defendants.

18 5. Defendants both directly and indirectly employed Plaintiff, as defined in the Fair  
19 Employment and Housing Act ("FEHA") at Government Code section § 12926(d).

20 6. In addition, Defendants compelled, coerced, aided, and abetted the harassment,  
21 which is prohibited under California Government Code section § 12940(i).

22 7. Finally, at all relevant times mentioned herein, all Defendants acted as agents of  
23 all other Defendants in committing the acts alleged herein.

24 8. *Jurisdiction and venue:* Jurisdiction and venue are proper in this court because:

25 a. At all relevant times, the unlawful employment practices occurred in Ojai,  
26 California, where Defendant City of Ojai Recreation Department operates and conducts business  
27 at 510 Park Road, Ojai, California 93023.

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**FACTS COMMON TO ALL CAUSES OF ACTION**

9. *Plaintiff's hiring:* Mora was hired on or about April 15, 2025 as a Recreation Leader.

10. *Plaintiff's protected status:*

a. Plaintiff is a Mexican-American female who suffers from dyslexia, a recognized disability requiring reasonable accommodations.

11. *Plaintiff's protected activity:*

a. Plaintiff engaged in protected activity by reporting workplace safety violations regarding alcohol consumption at softball games, supporting her supervisor's enforcement of policies, and reporting discrepancies in the gymnastics program.

12. *Defendants' adverse employment actions and behavior:*

a. Plaintiff Renee Mora began her employment with the City of Ojai Recreation Department on April 15, 2024, as a Recreation Leader. Based on her exemplary performance, she was promoted to Office Specialist II in September 2024, with a salary increase to \$23.98 per hour.

b. During her initial employment as Recreation Leader and Field Supervisor from May to August 2024, Plaintiff was responsible for supervising adult softball leagues and ensuring compliance with City policies. In May 2024, Plaintiff reported to her supervisor, Matt Davis, that participants were consuming excessive amounts of alcohol during games, violating the Ojai Recreation Softball code of conduct. After Mr. Davis sent an email reinforcing the alcohol prohibition policy, Plaintiff began experiencing harassment from players who would make hostile comments such as "Watch out, here comes that Bitch" and "Fucking Snitch."

c. The situation escalated in August 2024 when Brian Taylor, a softball player, became aggressive toward Plaintiff and other staff members. Taylor made discriminatory comments including "Fuck you Mexicans" and physically confronted Plaintiff, culminating in him chest-bumping her. Despite reporting this incident to City Manager Ben Harvey, the City failed to take appropriate corrective action, instead suggesting Plaintiff file personal charges against Taylor.

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1 d. In November 2024, after Mr. Davis was pressured to either resign or repair  
2 relationships with parents regarding gymnastics program issues, Plaintiff advocated on his  
3 behalf to City Manager Ben Harvey. Following this protected activity, Plaintiff began  
4 experiencing retaliation. The new interim manager, Kristy Rivera, excluded Plaintiff from  
5 communications about office procedures and recreation activities.

6 e. When Plaintiff requested disability accommodations for her dyslexia,  
7 including repetitive explanations and written instructions, the City failed to engage in the  
8 interactive process or provide reasonable accommodations. Instead, management used her  
9 disability against her, questioning her work performance despite her previous positive reviews.

10 f. The retaliation intensified when Plaintiff reported discrepancies in activity  
11 money processing to Kristy Rivera. Former employee Jeff Jones urged Plaintiff to quit, while  
12 colleague Brianna Soliz made unfounded accusations about Plaintiff exchanging sexual favors  
13 for promotions.

14 g. On December 17, 2024, after Plaintiff voiced concerns to HR about being  
15 retaliated against and sabotaged, Kristy Rivera reminded Plaintiff of her probationary status and  
16 suggested she could leave if unhappy. Shortly thereafter, on January 10, 2025, Plaintiff was  
17 abruptly terminated during a brief meeting with HR, with the only explanation being her  
18 "probationary" status, despite her history of positive performance.

19 h. The City employs more than five employees and operates the Recreation  
20 Department, which provides recreational programs and activities to the Ojai community.

21 13. *Economic damages:* As a consequence of Defendants' conduct Plaintiff has  
22 suffered and will suffer economic harm, including but not limited to: (1) lost past and future  
23 income; (2) lost employment benefits; (3) damage to their career prospects and earning capacity;  
24 (4) lost wages and overtime compensation; (5) unpaid expenses; and (6) statutory penalties, as  
25 well as interest on unpaid wages at the legal rate from and after each payday on which those  
26 wages should have been paid, all in amounts to be proven at trial.

27 14. *Non-economic damages:* As a consequence of Defendants' conduct, Plaintiff has  
28 suffered and will continue to suffer non-economic damages, including but not limited to: (1)

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1 psychological and emotional distress; (2) humiliation; (3) mental anguish; (4) physical pain and  
2 suffering; and (5) loss of enjoyment of life, all in amounts to be proven at trial.

3 15. *Attorneys' fees*: Plaintiff has incurred and continues to incur substantial legal  
4 expenses and attorneys' fees in the prosecution of this action and is entitled to an award of  
5 reasonable attorneys' fees and costs pursuant to applicable law, including but not limited to  
6 Government Code section § 12965(b) and Code of Civil Procedure section § 1021.5.

7 16. *Exhaustion of administrative remedies*: Prior to filing this action, Plaintiff satisfied  
8 all administrative prerequisites and exhausted all required administrative remedies by: (a) filing  
9 timely administrative complaints with the California Civil Rights Department ("CRD") and  
10 receiving Right to Sue notices for all FEHA-based claims; (b) timely filing a written government  
11 claim with Defendant public entity pursuant to Government Code §§ 910 et seq. for all tort claims,  
12 ; and (c) exhausting any applicable internal administrative grievance procedures as required by  
13 Defendant public entity's policies and procedures. Plaintiff has complied with all statutory  
14 prerequisites to filing this action against a public entity.

15 **FIRST CAUSE OF ACTION**

16 ***Discrimination on the Basis of Medical Condition in Violation of FEHA***

17 **(By Plaintiff Mora Against Defendants City of Ojai; and DOES 1 through 50)**

18 17. Plaintiff hereby incorporates by reference the preceding paragraphs of this  
19 complaint as if fully alleged herein.

20 18. At all times herein mentioned, California Government Code § 12940 et seq., was  
21 in full force and effect and were binding on Defendants, as Defendants regularly employed five  
22 (5) or more persons.

23 19. California Government Code § 12940(a) prohibits employers from discriminating  
24 against any person in compensation or in terms, conditions, or privileges of employment because  
25 of Medical Condition and Race.

26 20. Plaintiff is a member of a protected class based on Plaintiff's Medical Condition  
27 and Race.

28 21. Plaintiff was qualified for the position Plaintiff held and was performing

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1 satisfactorily.

2 22. Plaintiff suffered an adverse employment action.

3 23. The circumstances surrounding the adverse employment actions suggest that  
4 Plaintiff's Medical Condition and Race was a substantial motivating reason for Defendants'  
5 decisions.

6 24. Similarly situated employees not in Plaintiff's protected class were treated more  
7 favorably and/or were not subjected to similar adverse employment actions.

8 25. Defendants have failed to articulate a legitimate, non-discriminatory reason for the  
9 adverse employment action taken against Plaintiff. Even if Defendants were to articulate such a  
10 reason, such reason would be pretextual.

11 26. As a proximate result of the aforesaid acts of Defendants, Plaintiff has suffered  
12 actual, consequential and incidental financial losses, including without limitation, loss of salary  
13 and benefits, and the intangible loss of employment related opportunities in Plaintiff's field and  
14 damage to Plaintiff's professional reputation, all in an amount subject to proof at the time of trial.  
15 Plaintiff claims such amounts as damages pursuant to California Government Code § 3287 and/or  
16 § 3288 and/or any other provision of law providing for prejudgment interest.

17 27. As a proximate result of the wrongful acts of Defendants, Plaintiff has suffered and  
18 continues to suffer emotional distress, humiliation, mental anguish and embarrassment, as well as  
19 the manifestation of physical symptoms. Plaintiff is informed and believes and thereupon alleges  
20 that Plaintiff will continue to experience said physical and emotional suffering for a period in the  
21 future not presently ascertainable, all in an amount subject to proof at the time of trial.

22 28. As a proximate result of the wrongful acts of Defendants, Plaintiff has been forced  
23 to hire attorneys to prosecute Plaintiff's claims herein and has incurred and is expected to continue  
24 to incur attorneys' fees and costs in connection therewith. Plaintiff is entitled to recover attorneys'  
25 fees and costs under California Government Code § 12965(b).

26 **SECOND CAUSE OF ACTION**

27 ***Discrimination on the Basis of Race in Violation of FEHA***

28 **(By Plaintiff Mora Against Defendants City of Ojai; and DOES 1 through 50)**

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1           29. Plaintiff hereby incorporates by reference the preceding paragraphs of this  
2 complaint as if fully alleged herein.

3           30. At all times herein mentioned, California Government Code § 12940 et seq., was  
4 in full force and effect and were binding on Defendants, as Defendants regularly employed five  
5 (5) or more persons.

6           31. California Government Code § 12940(a) prohibits employers from discriminating  
7 against any person in compensation or in terms, conditions, or privileges of employment because  
8 of Medical Condition and Race.

9           32. Plaintiff is a member of a protected class based on Plaintiff's Medical Condition  
10 and Race.

11           33. Plaintiff was qualified for the position Plaintiff held and was performing  
12 satisfactorily.

13           34. Plaintiff suffered an adverse employment action.

14           35. The circumstances surrounding the adverse employment actions suggest that  
15 Plaintiff's Medical Condition and Race was a substantial motivating reason for Defendants'  
16 decisions.

17           36. Similarly situated employees not in Plaintiff's protected class were treated more  
18 favorably and/or were not subjected to similar adverse employment actions.

19           37. Defendants have failed to articulate a legitimate, non-discriminatory reason for the  
20 adverse employment action taken against Plaintiff. Even if Defendants were to articulate such a  
21 reason, such reason would be pretextual.

22           38. As a proximate result of the aforesaid acts of Defendants, Plaintiff has suffered  
23 actual, consequential and incidental financial losses, including without limitation, loss of salary  
24 and benefits, and the intangible loss of employment related opportunities in Plaintiff's field and  
25 damage to Plaintiff's professional reputation, all in an amount subject to proof at the time of trial.  
26 Plaintiff claims such amounts as damages pursuant to California Government Code § 3287 and/or  
27 § 3288 and/or any other provision of law providing for prejudgment interest.

28           39. As a proximate result of the wrongful acts of Defendants, Plaintiff has suffered and

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continues to suffer emotional distress, humiliation, mental anguish and embarrassment, as well as the manifestation of physical symptoms. Plaintiff is informed and believes and thereupon alleges that Plaintiff will continue to experience said physical and emotional suffering for a period in the future not presently ascertainable, all in an amount subject to proof at the time of trial.

40. As a proximate result of the wrongful acts of Defendants, Plaintiff has been forced to hire attorneys to prosecute Plaintiff's claims herein and has incurred and is expected to continue to incur attorneys' fees and costs in connection therewith. Plaintiff is entitled to recover attorneys' fees and costs under California Government Code § 12965(b).

### **THIRD CAUSE OF ACTION**

#### ***Failure to Make Reasonable Accommodation in Violation of FEHA (Gov't Code § 12940(m))***

##### **(By Plaintiff Mora Against Defendants City of Ojai; and DOES 1 through 50)**

41. Plaintiff hereby incorporates by reference the preceding paragraphs of this Complaint as if fully alleged herein.

42. At all times herein mentioned, California Government Code § 12940 et seq. was in full force and effect and was binding on Defendants, as Defendants regularly employed five (5) or more persons.

43. California Government Code § 12940(m)(1) makes it an unlawful employment practice for an employer "to fail to make reasonable accommodation for the known physical or mental disability of an applicant or employee."

44. Plaintiff had a physical and/or mental disability that was known to Defendants.

45. Plaintiff was able to perform the essential functions of the job with reasonable accommodation.

46. Defendants failed to provide reasonable accommodation for Plaintiff.

47. Providing reasonable accommodation would not have imposed an undue hardship on Defendants' operation.

48. As a direct and proximate result of Defendants' unlawful conduct, Plaintiff has suffered and will continue to suffer damages, including lost wages and benefits, emotional distress, and other damages in an amount to be proven at trial.

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1. Plaintiff seeks all remedies available under the FEHA, including compensatory damages, attorneys' fees pursuant to Government Code § 12965(b), costs of suit, and such other relief as the Court deems proper.

#### **FOURTH CAUSE OF ACTION**

***Failure to Prevent Discrimination in Violation of the FEHA (Gov't Code § 12940(k))***

**(By Plaintiff Mora Against Defendants City of Ojai; and DOES 1 through 50)**

49. Plaintiff hereby incorporates by reference the preceding paragraphs of this Complaint as if fully alleged herein.

50. At all times herein mentioned, California Government Code § 12940 et seq. was in full force and effect and was binding on Defendants, as Defendants regularly employed five (5) or more persons. California Government Code § 12940(k) requires employers to take all reasonable steps necessary to prevent discrimination and harassment from occurring.

51. Defendants willfully failed to take all reasonable steps necessary to prevent discrimination and harassment from occurring. Instead, Defendants pursued discriminatory actions against Plaintiff by continuing the discrimination and harassment despite Plaintiff having brought up concerns, which ultimately led to adverse employment actions against Plaintiff.

52. As a proximate result of Defendants' conduct, Plaintiff has suffered and will continue to suffer actual, consequential and incidental damages, including but not limited to, loss of wages and benefits, and the intangible loss of employment related opportunities in Plaintiff's field and damage to Plaintiff's professional reputation, all in an amount subject to proof at the time of trial. Plaintiff claims such amounts as damages pursuant to California Civil Code § 3287 and/or § 3288 and/or any other provisions of law providing for prejudgment interest.

53. As a proximate result of Defendants' conduct, Plaintiff has suffered and will continue to suffer emotional distress, humiliation, mental anguish and embarrassment, as well as the manifestation of physical symptoms. Plaintiff is informed and believes and thereupon alleges that Plaintiff will continue to experience said physical and emotional suffering for a period in the future not presently ascertainable, all in an amount subject to proof at trial.

2. As a proximate result of Defendants' conduct, Plaintiff has been forced to

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1 attorneys to prosecute the claims asserted herein and has incurred and is expected to continue to  
2 incur attorneys' fees and costs in connection therewith. Plaintiff is entitled to recover attorneys'  
3 fees and costs pursuant to California Government Code § 12965.

4 **FIFTH CAUSE OF ACTION**

5 ***Retaliation in Violation of FEHA (Gov't Code § 12940(h))***

6 **(By Plaintiff Mora Against Defendants City of Ojai; and DOES 1 through 50)**

7 54. Plaintiff hereby incorporates by reference the preceding paragraphs of this  
8 Complaint as if fully alleged herein.

9 55. At all times herein mentioned, California Government Code § 12940 et seq. was in  
10 full force and effect and was binding on Defendants, as Defendants regularly employed five (5) or  
11 more persons.

12 56. California Government Code § 12940(h) prohibits an employer from retaliating  
13 against an employee based upon the employee's opposition to practices forbidden under the Fair  
14 Employment and Housing Act, or for filing a complaint, testifying, or assisting in any proceeding  
15 under the FEHA.

16 57. Plaintiff engaged in protected activity under the FEHA.

17 58. Defendants were aware of Plaintiff's protected activity.

18 59. After Plaintiff engaged in protected activity, Defendants subjected Plaintiff to  
19 adverse employment action.

20 60. A causal connection exists between Plaintiff's protected activity and the adverse  
21 employment action taken by Defendants. The adverse employment action occurred within a short  
22 time after Plaintiff engaged in protected activity and/or other circumstances suggest a retaliatory  
23 motive.

24 61. As a proximate result of Defendants' conduct, Plaintiff has suffered and will  
25 continue to suffer actual, consequential and incidental damages, including but not limited to, loss  
26 of wages and benefits, and the intangible loss of employment related opportunities in Plaintiff's  
27 field and damage to Plaintiff's professional reputation, all in an amount subject to proof at the time  
28 of trial. Plaintiff claims such amounts as damages pursuant to California Civil Code § 3287 and/or

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§ 3288 and/or any other provisions of law providing for prejudgment interest.

62. As a proximate result of Defendants' conduct, Plaintiff has suffered and will continue to suffer emotional distress, humiliation, mental anguish and embarrassment, as well as the manifestation of physical symptoms. Plaintiff is informed and believes and thereupon alleges that Plaintiff will continue to experience said physical and emotional suffering for a period in the future not presently ascertainable, all in an amount subject to proof at trial.

63. As a proximate result of Defendants' conduct, Plaintiff has been forced to hire attorneys to prosecute the claims asserted herein and has incurred and is expected to continue to incur attorneys' fees and costs in connection therewith. Plaintiff is entitled to recover attorneys' fees and costs pursuant to California Government Code § 12965.

#### **SIXTH CAUSE OF ACTION**

##### ***Whistleblower Retaliation in Violation of Labor Code § 1102.5***

**(By Plaintiff Mora Against Defendants City of Ojai; and DOES 1 through 50)**

64. Plaintiff hereby incorporates by reference the preceding paragraphs of this complaint as if fully alleged herein.

65. California Labor Code § 1102.5(b) prohibits employers from retaliating against an employee where the employee has disclosed information, or the employer believes that the employee disclosed or may disclose information, to a government or law enforcement agency, to a person with authority over the employee or another employee who has the authority to investigate, discover, or correct the violation or noncompliance, if the employee has reasonable cause to believe that the information discloses a violation of state or federal statute, or a violation or noncompliance with a local, state or federal rule or regulation, regardless of whether disclosing the information is part of the employee's job duties.

66. California Labor Code § 1102.5(c) also forbids retaliation "against an employee for refusing to participate in an activity that would result in a violation of state or federal statute, or a violation of or noncompliance with a local, state, or federal rule or regulation."

67. Plaintiff engaged in protected activity under Labor Code § 1102.5.

68. Plaintiff had reasonable cause to believe that the information disclosed

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1 a violation of state or federal statute, or a violation or noncompliance with a local, state or federal  
2 rule or regulation.

3 69. In response to Plaintiff's protected activity, Defendants subjected Plaintiff to  
4 adverse employment action.

5 70. A causal connection exists between Plaintiff's protected whistleblowing activity  
6 and the adverse employment action taken by Defendants. Plaintiff's protected activity was a  
7 contributing factor in Defendants' decision to take adverse employment action against Plaintiff."

8 71. Defendants' adverse employment action against Plaintiff constitutes unlawful  
9 retaliation on account of Plaintiff's protected activity in violation of Labor Code § 1102.5.

10 72. Under Labor Code § 1102.6, once Plaintiff demonstrates by a preponderance of the  
11 evidence that retaliation was a contributing factor in the adverse employment action, the burden  
12 shifts to Defendants to demonstrate by clear and convincing evidence that they would have taken  
13 the same action for legitimate, independent reasons even had Plaintiff not engaged in protected  
14 activity.

15 73. As a proximate result of Defendants' conduct, Plaintiff has suffered and continues  
16 to suffer damages in terms of lost wages, lost bonuses, lost benefits, and other pecuniary loss  
17 according to proof. Plaintiff has also suffered and will continue to suffer physical and emotional  
18 injuries, including nervousness, humiliation, depression, anguish, embarrassment, fright, shock,  
19 pain, discomfort, fatigue, and anxiety. The amount of Plaintiff's damages will be ascertained at  
20 trial.

21 74. Plaintiff is entitled to recover a civil penalty of \$10,000 for each violation, to be  
22 awarded to the employee who suffered the violation.

23 3. Plaintiff is entitled to reasonable attorney fees pursuant to Labor Code § 1102.5(j).

24 **SEVENTH CAUSE OF ACTION**

25 ***Retaliation for Complaints About Workplace Safety and Health in Violation of Labor Code***

26 ***§ 6310***

27 **(By Plaintiff Mora Against Defendants City of Ojai; and DOES 1 through 50)**

28 75. Plaintiff hereby incorporates by reference the preceding paragraphs of this



1 Complaint as if fully alleged herein.

2 76. California Labor Code § 6310 prohibits employers from retaliating against  
3 employees who: (a) file a health or safety complaint with the Division of Occupational Safety and  
4 Health, another agency with statutory responsibility for or assisting the Division, the employer, or  
5 their representative; (b) institute or cause to be instituted a safety proceeding, or testify in one; (c)  
6 exercise rights under safety and health laws; (d) participate in an occupational health and safety  
7 committee; (e) report a work-related fatality, injury or illness; (f) request certain mandated  
8 occupational injury or illness reports; or (g) exercise rights protected by the federal Occupational  
9 Safety and Health Act.

10 77. Plaintiff engaged in protected activity under Labor Code § 6310.

11 78. Defendants were aware of Plaintiff's protected activity.

12 79. After Plaintiff engaged in protected activity, Defendants retaliated against Plaintiff  
13 with adverse employment actions.

14 80. Defendants' retaliatory actions were motivated by Plaintiff's protected activity  
15 under Labor Code § 6310.

16 81. Labor Code § 6310 also protects employees who are subject to "preemptive  
17 retaliation" - where an employer fires an employee whom the employer fears will complain of  
18 safety violations.

19 82. Plaintiff has suffered damages as a result of Defendants' unlawful retaliation,  
20 including but not limited to lost wages, lost benefits, emotional distress, and other damages  
21 according to proof.

22 83. Plaintiff is entitled to reinstatement and reimbursement for lost wages and work  
23 benefits caused by Defendants' acts.

24 84. Plaintiff is not required to exhaust administrative remedies before bringing this  
25 action.

26 4. Plaintiff seeks all available remedies, including but not limited to reinstatement,  
27 reimbursement for lost wages and work benefits, compensatory damages, interest, and costs.  
28

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**EIGHTH CAUSE OF ACTION**

***Wrongful Termination in Violation of the FEHA***

**(By Plaintiff Mora Against Defendants City of Ojai; and DOES 1 through 50)**

85. Plaintiff hereby incorporates by reference the preceding paragraphs of this Complaint as if fully alleged herein.

86. At all times herein mentioned, California Government Code § 12940 et seq. was in full force and effect and was binding on Defendants, as Defendants regularly employed five (5) or more persons. California Government Code § 12940(a) provides that it is unlawful for an employer, because of a protected characteristic or protected activity, to discharge a person from employment.

87. Plaintiff was terminated and the circumstances surrounding Plaintiff's termination suggest that Plaintiff's protected characteristics and/or protected activity was a substantial motivating reason for Defendants' decision.

88. As a proximate result of the aforesaid acts of Defendants, Plaintiff has suffered actual, consequential and incidental financial losses, including without limitation, loss of salary and benefits, and the intangible loss of employment related opportunities in Plaintiff's field and damage to Plaintiff's professional reputation, all in an amount subject to proof at the time of trial. Plaintiff claims such amounts as damages pursuant to California Government Code § 3287 and/or § 3288 and/or any other provision of law providing for prejudgment interest.

89. As a proximate result of the wrongful acts of Defendants, Plaintiff has suffered and continues to suffer emotional distress, humiliation, mental anguish and embarrassment, as well as the manifestation of physical symptoms. Plaintiff is informed and believes and thereupon alleges that Plaintiff will continue to experience said physical and emotional suffering for a period in the future not presently ascertainable, all in an amount subject to proof at the time of trial.

5. As a proximate result of the wrongful acts of Defendants, Plaintiff has been forced to hire attorneys to prosecute Plaintiff's claims herein and has incurred and is expected to continue to incur attorneys' fees and costs in connection therewith. Plaintiff is entitled to recover attorneys' fees and costs under California Government Code § 12965(b).

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1 **NINTH CAUSE OF ACTION**

2 ***Wrongful Termination in Violation of Public Policy***

3 **(By Plaintiff Mora Against Defendants City of Ojai; and DOES 1 through 50)**

4 90. Plaintiff hereby incorporates by reference the preceding paragraphs of this  
5 Complaint as if fully alleged herein.

6 91. To establish a claim for wrongful discharge in violation of public policy, Plaintiff  
7 must prove: (a) an employer-employee relationship; (b) termination or other adverse employment  
8 action; (c) the termination violated public policy; (d) the termination was a legal cause of Plaintiff's  
9 damage; and (e) the nature and extent of Plaintiff's damage.

10 92. At all times herein mentioned, the public policy of the State of California is to  
11 prohibit employers from engaging in the conduct alleged herein. This public policy is fundamental,  
12 substantial, and well-established in constitutional or statutory provisions. This public policy is  
13 designed to protect all employees and to promote the welfare and well-being of the community at  
14 large, not merely to serve the interests of the individual Plaintiff. Accordingly, the actions of  
15 Defendants, and each of them, in terminating Plaintiff, on the grounds alleged herein were  
16 wrongful and in contravention of the express public policy of the State of California.

17 93. The public policy basis for this claim is firmly established in fundamental statutory  
18 or constitutional provisions, including but not limited to: The California Fair Employment and  
19 Housing Act (Gov. Code § 12940 et seq.), which prohibits discrimination, harassment, and  
20 retaliation based on protected characteristics; California Labor Code § 1102.5, which prohibits  
21 retaliation against whistleblowers; California Labor Code § 6310, which prohibits retaliation for  
22 complaints about workplace safety and health; California Health & Safety Code § 1278.5, which  
23 prohibits retaliation against healthcare workers who report patient safety concerns; and California  
24 Labor Code §§ 201, 203, 226, 226.7, and 1194, which protect employees' rights to timely payment  
25 of wages, accurate wage statements, meal and rest breaks, and overtime compensation.

26 94. Plaintiff engaged in protected activity. Plaintiff need not prove an actual violation  
27 of law; it is sufficient that Plaintiff had a reasonable and good faith belief that the law of the City of Ojai  
28 violated.

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1 95. Defendants were aware of Plaintiff's protected activity.

2 96. Defendants terminated Plaintiff's employment in retaliation for Plaintiff's  
3 protected activity.

4 97. As a proximate result of Defendants' conduct, Plaintiff has suffered and will  
5 continue to suffer actual, consequential and incidental damages, including but not limited to loss  
6 of wages and benefits, and the intangible loss of employment related opportunities in Plaintiff's  
7 field and damage to Plaintiff's professional reputation, all in an amount subject to proof at the time  
8 of trial. Plaintiff claims such amounts as damages pursuant to California Civil Code §§ 3287 and/or  
9 3288 and/or any other provisions of law providing for prejudgment interest.

10 98. As a proximate result of Defendants' conduct, Plaintiff has suffered and will  
11 continue to suffer emotional distress, humiliation, mental anguish and embarrassment, as well as  
12 the manifestation of physical symptoms. Plaintiff is informed and believes, and thereupon alleges,  
13 that Plaintiff will continue to experience said physical and emotional suffering for a period in the  
14 future not presently ascertainable, all in an amount subject to proof at trial.

15 99. Plaintiff also incurred and continues to incur legal expenses and attorneys' fees.  
16 Plaintiff is presently unaware of the precise amount of these expenses and fees. Plaintiff requests  
17 attorneys' fees pursuant to Government Code § 12965.

18 100. The statute of limitations for this wrongful termination in violation of public policy  
19 claim is two years pursuant to CCP § 335.1, even when the limitations period for the underlying  
20 policy is one year.

21 6. This claim is not preempted by the Workers' Compensation Act, as wrongful  
22 termination in violation of public policy is one type of claim not barred by the exclusive remedy  
23 provisions of the Workers' Compensation Act.

24 **DEMAND FOR JURY TRIAL**

25 Plaintiff hereby demands a trial by jury on all issues so triable.

26 **PRAYER FOR RELIEF**

27 WHEREFORE, Plaintiff prays for judgment against Defendants as follows

28 1. For compensatory damages in an amount according to proof.

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2. For special damages in an amount according to proof.
3. For general damages in an amount according to proof.
4. For penalties under the *Labor Code* in an amount according to proof.
5. For statutory penalties, according to proof.
6. For injunctive relief, including employment, reinstatement, and promotion.
7. For declaratory relief, declaring the amounts of damages, penalties, equitable relief, costs, and attorney's fees to which Plaintiff is entitled.
8. For reasonable attorney's fees and expenses pursuant to Government Code § 12965(b), Labor Code §§ 218.5, 1194, and other applicable statutes.
9. For costs of the suit herein incurred.
10. For pre-judgment and post-judgment interest; and
11. For such other and further relief as this court may deem just and proper.

DATED: June 23, 2025

**HERSHEY LAW, P.C.**

By: 

Brennan Hershey  
Johnny Rundell  
Attorneys for Plaintiff RENEE  
MORA

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**SUPERIOR COURT OF CALIFORNIA  
COUNTY OF VENTURA**

800 South Victoria Avenue  
Ventura, CA 93009  
(805) 289-8525

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**NOTICE OF CASE ASSIGNMENT AND MANDATORY APPEARANCE**

Your case has been assigned for all purposes to the judicial officer indicated below.

A copy of this Notice of Case Assignment and Mandatory Appearance shall be served by the filing party on all named Defendants/Respondents with the Complaint or Petition, and with any Cross-Complaint or Complaint in Intervention that names a new party to the underlying action.

<b>Case Number:</b> 2025CUWT046231		<b>Location:</b> Hall of Justice
<b>Assigned Judicial Officer:</b> Carla J. Ortega		<b>Department:</b> 41
<b>Hearing:</b> MANDATORY APPEARANCE CMC/Order to Show Cause Re Sanctions/Dismissal for Failure to File Proof of Service/Default		
<b>Event Date:</b> 12/16/2025	<b>Event Time:</b> 8:35 AM	<b>Event Department:</b> 41

**Scheduling Information**

**Judicial Scheduling Information:** The above hearing is MANDATORY. Each party is ordered to file a Case Management Statement no later than 15 calendar days prior to the hearing and serve it on all parties. If your Case Management Statement is untimely, it may NOT be considered by the court (CRC 3.725) and you may be sanctioned for noncompliance with a court order (CCP 177.5). If proof of service and/or request for entry of default have not been filed: At the above hearing you are ordered to show cause why you should not be compelled to pay sanctions and/or why your case should not be dismissed (CCP 177.5, Local Rule 3.17).

**Advanced Jury Fee Requirement:** At least one party demanding a jury trial on each side of a civil case must pay a non-refundable jury fee of \$150. The non-refundable jury fee must be paid timely pursuant to Code of Civil Procedure section 631.

**Noticed Motions/Ex Parte Matters:** To set an ex parte hearing, contact the judicial secretary in the assigned department. Contact the clerk's office to reserve a date for a law and motion matter.

**Remote Appearances:** Remote appearances by CourtCall at the Mandatory Case Management Conference are permitted pursuant to CRC 3.722, 3.672, Local Rule 7.06, and may be permitted by Zoom per the applicable department rules and policies. To schedule a CourtCall appearance, a party must pre-register with CourtCall at <https://courtcall.com/support/faq/registration> or call 888-882-6878. To appear by Zoom, consult the rules and procedures of the civil department to which your matter is assigned at <https://www.ventura.courts.ca.gov/assignments-vent.html>.

Clerk of the Court,



Date: 06/30/2025

Joan Foster

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