

Assigned for all purposes to: Chatsworth Courthouse, Judicial Officer: Karen Moskowitz

PLD-C-001

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): AAA Healthcare Products, Inc. 18529 Roscoe Blvd., Northridge, CA 91324 TELEPHONE NO: (818) 882-3131 FAX NO. (Optional): (818) 882-3133 E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): In Pro Per		FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS: 9425 Penfield Avenue MAILING ADDRESS: Same as above CITY AND ZIP CODE: Chatsworth, CA 91311 BRANCH NAME: North Valley Judicial District PLAINTIFF: AAA Healthcare Products, Inc. DEFENDANT: Gates to Paradise Hospice Care, Inc. <input checked="" type="checkbox"/> DOES 1 TO 10		
CONTRACT <input checked="" type="checkbox"/> COMPLAINT <input type="checkbox"/> AMENDED COMPLAINT (Number): <input type="checkbox"/> CROSS-COMPLAINT <input type="checkbox"/> AMENDED CROSS-COMPLAINT (Number):		
Jurisdiction (check all that apply): <input checked="" type="checkbox"/> ACTION IS A LIMITED CIVIL CASE Amount demanded <input checked="" type="checkbox"/> does not exceed \$10,000 <input type="checkbox"/> exceeds \$10,000 but does not exceed \$25,000 <input type="checkbox"/> ACTION IS AN UNLIMITED CIVIL CASE (exceeds \$25,000) <input type="checkbox"/> ACTION IS RECLASSIFIED by this amended complaint or cross-complaint <input type="checkbox"/> from limited to unlimited <input type="checkbox"/> from unlimited to limited		CASE NUMBER: 22CHLC05178

1. Plaintiff* (name or names):
AAA Healthcare Products, Inc.
alleges causes of action against defendant* (name or names):
Gates to Paradise Hospice Care, Inc.
2. This pleading, including attachments and exhibits, consists of the following number of pages:
3. a. Each plaintiff named above is a competent adult
☐ except plaintiff (name):
 - (1) ☒ a corporation qualified to do business in California
 - (2) ☐ an unincorporated entity (describe):
 - (3) ☐ other (specify):
b. ☒ Plaintiff (name): AAA Healthcare Products, Inc.
 - a. ☐ has complied with the fictitious business name laws and is doing business under the fictitious name (specify):
 - b. ☒ has complied with all licensing requirements as a licensed (specify): health medical equipment business.
c. ☐ Information about additional plaintiffs who are not competent adults is shown in Attachment 3c.
4. a. Each defendant named above is a natural person
☒ except defendant (name): Gates to Paradise Hospice Care, Inc. ☐ 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):
 - (1) ☐ a business organization, form unknown
 - (2) ☐ a corporation
 - (3) ☐ an unincorporated entity (describe):
 - (4) ☐ a public entity (describe):
 - (5) ☐ other (specify):

* If this form is used as a cross-complaint, plaintiff means cross-complainant and defendant means cross-defendant.

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SHORT TITLE: AAA Healthcare Products, Inc. v. Gates to Paradise Hospice Care, Inc.

CASE NUMBER:

4. (Continued)

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

(1) ☐ Doe defendants (specify Doe numbers): _____ were the agents or employees of the named defendants and acted within the scope of that agency or employment.(2) ☒ Doe defendants (specify Doe numbers): 1-10 _____ are persons whose capacities are unknown to plaintiff.c. ☐ Information about additional defendants who are not natural persons is contained in Attachment 4c.d. ☐ Defendants who are joined under Code of Civil Procedure section 382 are (names): _____5. ☐ Plaintiff is required to comply with a claims statute, anda. ☐ has complied with applicable claims statutes, orb. ☐ is excused from complying because (specify): _____6. ☐ This action is subject to ☐ Civil Code section 1812.10 ☐ Civil Code section 2984.4.

7. This court is the proper court because

a. ☒ a defendant entered into the contract here.b. ☐ a defendant lived here when the contract was entered into.c. ☐ a defendant lives here now.d. ☐ the contract was to be performed here.e. ☐ a defendant is a corporation or unincorporated association and its principal place of business is here.f. ☐ real property that is the subject of this action is located here.g. ☐ other (specify): _____

8. 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):

☒ Breach of Contract☒ Common Counts☐ Other (specify): _____9. ☐ Other allegations:

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

a. ☒ damages of: \$ 8609.50b. ☒ interest on the damages(1) ☐ according to proof(2) ☒ at the rate of (specify): 10%

percent per year from (date): 5/30/21.

c. ☐ attorney's fees(1) ☐ of: \$(2) ☐ according to proof.d. ☐ other (specify): _____11. ☒ The paragraphs of this pleading alleged on information and belief are as follows (specify paragraph numbers):

1-11

Date: October 7, 2021

Anahit Ojenian, for AAA Healthcare Products, Inc.

(TYPE OR PRINT NAME)



(SIGNATURE OF PLAINTIFF OR ATTORNEY)

(If you wish to verify this pleading, affix a verification)

SHORT TITLE:

AAA Healthcare Products, Inc. v. Gates to Paradise Hospice Care, Inc.

CASE NUMBER

First

(number)

CAUSE OF ACTION—Breach of Contract

ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

BC-1. Plaintiff (name): AAA Healthcare Products, Inc.

alleges that on or about (date): 9/11/2020

a ☒ written ☐ oral ☐ other (specify):

agreement was made between (name parties to agreement):

AAA Healthcare Products, Inc. and Gates to Paradise Hospice Care, Inc.

☐ A copy of the agreement is attached as Exhibit A, or

☐ The essential terms of the agreement ☐ are stated in Attachment BC-1 ☐ are as follows (specify):

BC-2. On or about (dates): ~~March 2020~~ 5/30/21

defendant breached the agreement by ☐ the acts specified in Attachment BC-2 ☒ the following acts (specify):

non-payment of amount of invoices.

BC-3. Plaintiff has performed all obligations to defendant except those obligations plaintiff was prevented or excused from performing.

BC-4. Plaintiff suffered damages legally (proximately) caused by defendant's breach of the agreement

☐ as stated in Attachment BC-4 ☒ as follows (specify):

Merchandise in the sum of \$8,609.50.

BC-5. ☐ Plaintiff is entitled to attorney fees by an agreement or a statute

☐ of \$

☐ according to proof.

BC-6. ☐ Other:

SHORT TITLE:
AAA Healthcare Products, Inc. v. Gates to Paradise Hospice Care, Inc.

CASE NUMBER:

Second **CAUSE OF ACTION—Common Counts**

(number)

ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

CC-1. Plaintiff (name): AAA Healthcare Products, Inc.

alleges that defendant (name): Gates to Paradise Hospice Care, Inc.

became indebted to ☒ plaintiff ☐ other (name):

a. ☐ within the last four years

(1) ☐ on an open book account for money due.

(2) ☐ because an account was stated in writing by and between plaintiff and defendant in which it was agreed that defendant was indebted to plaintiff.

b. ☒ within the last ☒ two years ☐ four years

(1) ☐ for money had and received by defendant for the use and benefit of plaintiff.

(2) ☐ for work, labor, services and materials rendered at the special instance and request of defendant and for which defendant promised to pay plaintiff.

☒ the sum of \$

☐ the reasonable value.

(3) ☒ for goods, wares, and merchandise sold and delivered to defendant and for which defendant promised to pay plaintiff

☒ the sum of \$8,609.50

☐ the reasonable value.

(4) ☐ for money lent by plaintiff to defendant at defendant's request.

(5) ☐ for money paid, laid out, and expended to or for defendant at defendant's special instance and request.

(6) ☐ other (specify):

CC-2. \$8,609.50, which is the reasonable value, is due and unpaid despite plaintiff's demand,

plus prejudgment interest ☐ according to proof ☒ at the rate of 10% percent per year

from (date): 5/30/21

CC-3. ☐ Plaintiff is entitled to attorney fees by an agreement or a statute

☐ of \$

☐ according to proof.

CC-4. ☐ Other:

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CAUSE OF ACTION—Common Counts