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**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF ORANGE**

SARA KHALIL FARSAKH, an individual; SOONDUS AHMED, an individual; RAWAN HAMDAN, an individual; SARA C., an individual; YUMNA H., an individual; SAFA R., an individual; MARWA R., an individual,

Plaintiffs,

vs.

URTH CAFFE CORPORATION; URTH CAFFE LAGUNA BEACH DEVELOPMENT, LLC; URTH PAYROLL SERVICES, INC.; AND URTH CAFFE ASSOCIATES VI, LLC,

Defendants.

URTH LAGUNA BEACH DEVELOPMENT, LLC, a California limited liability company; and URTH CAFFE' ASSOCIATES VII, LLC, a California limited liability company,

Cross-Complainants,

vs.

SARA KHALIL FARSAKH, an individual; SOONDUS AHMED, an individual; RAWAN HAMDAN, an individual; SARA C., an individual; YUMNA H., an individual; SAFA R., an individual; MARWA R., an individual,

Cross-Defendants.

Case No.: 30-2016-00849787-CU-CR-CJC

Hon. John C. Gastelum  
Dept. C-13

**CROSS-COMPLAINANTS' NOTICE OF MOTION AND MOTION FOR LEAVE TO FILE FIRST AMENDED CROSS-COMPLAINT**

Hearing Date: October 31, 2017

Time: 2:00 PM

Department: C-13, Central Justice Center  
RESERVATION #: 72657177  
(Transaction #: 544960377)

Discovery Cut-Off: By Code  
Motion Cut-Off: By Code  
Trial Date: March 5, 2018

Action Filed: May 2, 2016

1 **TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 PLEASE TAKE NOTICE that on October 31, 2017, at 2:00 p.m., or as soon thereafter as  
3 the matter may be heard in the above entitled court located at 700 Civic Center Drive West, Santa  
4 Ana, CA 92701, Cross-Complainants Urth Laguna Beach Development, LLC, and Urth Caffè'  
5 Associates VI, LLC ("Cross-Complainants") in the above-entitled action, will and hereby do  
6 move this Court for an order granting leave to file the proposed first amended cross-complaint  
7 filed herewith and that the proposed first amended complaint filed herewith be deemed filed.

8 The substantive changes sought by the proposed first amended complaint include what  
9 Urth Caffè believes to be the full legal names of the four anonymous Cross-Defendants, the birth  
10 dates of all Cross-Defendants, and the street and city of residence of five of the Cross-Defendants.

11 This motion is based on the instant notice, the attached memorandum of points and  
12 authorities together with its appendix setting forth the proposed amendments pursuant to  
13 California Rules of Court, Rule 3.1324(a)(2)-(3), the Declaration of David Yerushalmi and  
14 attached exhibits, including the proposed first amended complaint in a "clean" and "redlined"  
15 version, and any pleadings and files maintained by the Court on this action, as well as on any  
16 oral argument or evidence which may be presented at the hearing on this motion.

17 DATED: September 6, 2017

AMERICAN FREEDOM LAW CENTER, INC.

18  
19 By:



20 DAVID YERUSHALMI  
Attorneys for Defendants/Cross-Complainants

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1 **I. CONTEXT.**

2 This motion for leave to file Cross-Complainants’ proposed First Amended Verified  
3 Cross-Complaint comes before this Court as part of an underlying lawsuit involving an allegation  
4 by seven young women who visited the Urth Caffè in Laguna Beach on Friday night, April 22,  
5 2016. Plaintiffs/Cross-Defendants (“Plaintiffs” or “Cross-Defendants” as context requires) claim  
6 they were asked to leave because six of the women wore hijabs—that is, Plaintiffs allege that the  
7 Urth Caffè in Laguna Beach<sup>1</sup> is liable for religious discrimination in violation of the Unruh Civil  
8 Rights Act. (Compl. ¶¶ 45-51). Plaintiffs, however, present no actual evidence of discrimination.  
9 In fact, at the time, the women did not claim religious discrimination, but rather that they were  
10 being treated unfairly and singled-out. (Cross-Compl. ¶¶ 1-17; *see also* Compl. at ¶¶ 23-39).

11 To suggest an anti-Muslim bias by Urth Caffè is counterfactual and illogical. It is well  
12 known to Urth Caffè’s customers, to the neighbors of the Laguna Beach café, and even to  
13 Plaintiffs, that the Urth Caffè in Laguna Beach is enormously popular among the local young  
14 Arab and Muslim population. (This is also true of most of the Urth Caffè locations.) Muslims  
15 make up a very large portion of the paying customer base of Urth Caffè. (Cross-Compl. ¶¶ 3-6;  
16 *see also* Compl. ¶¶ 21-22).

17 The reality is that no one at Urth Caffè instituted or carried out any policy of religious  
18 discrimination or engaged in any act of religious discrimination. (Cross-Compl. ¶¶ 7-20). On  
19 the night of April 22, one of the senior managers of Urth Caffè, Antino Jimenez, began  
20 implementing Urth Caffè’s regular “45-minute” policy. In anticipation of the very busy hours  
21 on Friday night and at the first sign of lines queuing for the high-demand patio seats, Antino

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22  
23 <sup>1</sup> Plaintiffs named several Urth Caffè related entities as Defendants in their complaint  
24 (“Complaint”). Most of these entities have no connection to the operation or ownership of the  
25 Urth Caffè in Laguna Beach. The two Cross-Complainants are, respectively, the owner of the  
premises upon which the Urth Caffè in Laguna Beach operates and the entity that owns and  
operates the café. (Cross-Compl. ¶¶ 21-22). We will refer to Defendants/Cross-Complainants  
collectively as “Urth Caffè” in the singular.

1 informed several groups of customers, each of whom had been seated for more than an hour, that  
2 they should be prepared to share their tables or move to some other location. (Plaintiffs had  
3 occupied three tables for more than an hour.) This would allow other customers to rotate into  
4 the high-demand popular tables. (Cross-Compl. ¶ 9).

5 Plaintiffs refused to follow the policy, and their disruptive, rude, and aggressive conduct  
6 resulted in an Urth Caffe security guard asking them to leave the café. They refused. Jilla  
7 Berkman authorized staff to contact the local police who arrived on the scene. Only after 45  
8 minutes did Plaintiffs leave the premises, and this was only after the police were called and  
9 arrived on the scene. (Cross-Compl. ¶¶ 10-17).

## 10 **II. THE RELEVANT FACTS.**

11 Plaintiffs filed the Complaint on May 2, 2016. Plaintiffs utilized only the first name and  
12 first letter of the last name for four of the Plaintiffs in the caption and in the allegations (*i.e.*,  
13 “SARA C., an individual; YUMNA H., an individual; SAFA R., an individual; MARWA R., an  
14 individual”). (Yerushalmi Dec. ¶ 3).

15 Urth Caffe served identical Form Interrogatories (General) and Requests for Production  
16 of Documents on each Plaintiff on July 11, 2017. General Form Interrogatory 2.1 sought the full  
17 names of all Plaintiffs and any names used in the past. For each of the four anonymous Plaintiffs,  
18 Plaintiffs’ responses provided only the first name and first letter of the last name as it appeared  
19 in the caption of the Complaint. After several meet-and-confer telephone conferences and email  
20 exchanges, the anonymous Plaintiffs continue to refuse to provide their full names. (Yerushalmi  
21 Dec. ¶ 8).

22 On August 11, 2017, the parties jointly briefed and filed an *ex parte* application in which  
23 Plaintiffs sought an order permitting the four anonymous Plaintiffs to continue litigating  
24 anonymously and, further, to withhold providing their full names to Urth Caffe even under seal  
25 pursuant to the stipulated protective order entered into earlier in this matter. In the *ex parte*

1 application, for its part, Urth Caffè sought an order requiring Plaintiffs to provide their full names  
2 for the record. On August 16, 2017, the Court denied the *ex parte* application and informed the  
3 parties that they may move by motion for the requested relief without prejudice. (Yerushalmi  
4 Dec. ¶ 11).

5 During the depositions of Sara Farsakh, Sara C., a/k/a Sara Soumaya Chamma and  
6 Yumna H. a/k/a Yumna H. Hameed, respectively on August 22, 25, and 28, each of the Plaintiff-  
7 deponents refused to provide the full names of the anonymous Plaintiffs upon instruction from  
8 their counsel. (Yerushalmi Dec. ¶ 11).

9 Plaintiffs have filed no motion seeking a protective order or any other order relating to  
10 their claim for anonymity. (Yerushalmi Dec. ¶ 12).

11 Based upon information obtained during the three depositions set forth above and upon a  
12 deeper search of public records, Urth Caffè determined what it believes to be the full legal names  
13 of the four anonymous Plaintiffs/Cross-Defendants. (Yerushalmi Dec. ¶ 13).

14 **III. MEET-AND-CONFERENCE.**

15 The parties have met and conferred extensively on the issue of anonymity and have jointly  
16 briefed an *ex parte* application on the matter. Plaintiffs/Cross-Defendants have refused to  
17 provide the full names of the anonymous Plaintiffs and have indicated that they oppose any effort  
18 to have their names set out in the public record of this litigation. (Yerushalmi Dec. ¶ 14).

19 **IV. LEAVE SHOULD BE GRANTED TO FILE THE FIRST AMENDED CROSS-**  
20 **COMPLAINT.**

21 “The court may, in furtherance of justice, and on any terms as may be proper, allow a  
22 party to amend any pleading[.]” Cal. Civ. Proc. Code § 473(a)(1); *see also* Cal. Civ. Proc. Code  
23 § 576 (“Any judge, at any time before or after commencement of trial, in the furtherance of  
24 justice, and upon such terms as may be proper, may allow the amendment of any pleading.”).



1           “There is a strong policy in favor of liberal allowance of amendments.” *Mesler v. Bragg*  
2 *Mgmt. Co.*, 39 Cal. 3d 290, 296 (Cal. 1985). In some instances, leave to amend a complaint will  
3 be denied if there has been an unreasonable delay in seeking leave, and where, as a result of that  
4 delay, granting leave would prejudice the defendant. *See A.N. v. Cnty. of L.A.*, 171 Cal. App. 4th  
5 1058, 1068 (Cal. App. 2009). But even unreasonable delay does not justify denial of leave when  
6 leave is sought well before trial and the proposed amendment only concerns the introduction of  
7 new legal theories that “relate to the same general set of facts” previously pleaded. *See Kittredge*  
8 *Sports Co. v. Super. Ct.*, 213 Cal. App. 3d 17 1045, 1048 (Cal. App. 1989) (citation omitted);  
9 *accord Morgan v. Super. Ct.*, 172 Cal. App. 2d 527, 530 (Cal. App. 1959) (“It is a rare case in  
10 which a court will be justified in refusing a party leave to amend his pleadings so that he may  
11 properly present his case.”) (citations omitted) (internal quotation marks omitted).

12           **A.       This Motion for Leave to Amend Is Timely.**

13           Urth Caffè only recently determined the full names of the anonymous Plaintiffs/Cross-  
14 Defendants based upon information gleaned from the recently conducted depositions of three of  
15 the Plaintiffs and a deeper examination of the public record. There has been no delay in seeking  
16 leave to amend.

17           Further, the trial of this matter is set for March 5, 2018, and discovery continues. In fact,  
18 while Plaintiffs and Defendants had agreed upon a deposition schedule for August and September  
19 2017 for all Plaintiffs and five Urth Caffè employees, Plaintiffs just recently cancelled all of the  
20 depositions scheduled for the Urth Caffè employees, with their counsel suggesting the parties  
21 will need to reschedule those depositions at a later undetermined date. Urth Caffè intends to  
22 complete its scheduled depositions of all Plaintiffs except one by September 13. (N.B.: The one  
23 Plaintiff deposition that will not be completed as agreed to by the parties is Rawan Hamdan, who  
24 apparently resides in Jordan and has refused to have her deposition taken in California. While  
25 the parties agreed to take her deposition by video, at the last minute Hamdan’s counsel informed

1 Urth Caffè's counsel that his client could not arrange to have a deposition officer present as  
2 required by statute. *See* Cal. Civ. Proc. Code § 2025.310(b).)

3 **B. The First Amended Cross-Complaint Will Not Prejudice Cross-Defendants.**

4 The only substantive changes sought by the proposed First Amended Verified Cross-  
5 Complaint is to include what Urth Caffè believes to be the full legal names of the four anonymous  
6 Cross-Defendants, the birth dates of all Cross-Defendants, and the street and city of residence of  
7 five of the Cross-Defendants.

8 As is well-known, a plaintiff, or in this case a cross-complainant, is the “‘master’ of [the]  
9 complaint.” *See, e.g., Fuller v. First Franklin Fin. Corp.*, 216 Cal. App. 4th 955, 963, 163 Cal.  
10 Rptr. 3d 44, 50 (Cal. App. 2013) (citing *Nagy v. Nagy*, 210 Cal.App.3d 1262, 1267 [Cal. App.  
11 1989]). Thus, we begin with the proposition that Urth Caffè has the right to name Cross-  
12 Defendants and to identify them for the public record. There is no statute, rule of court, or order  
13 that provides otherwise.

14 We further note that Cross-Defendants have had the opportunity to move the Court for a  
15 protective order and have chosen not to do so. Finally, we note that Cross-Defendants have had  
16 the opportunity to provide this information to Urth Caffè under seal pursuant to the existing  
17 protective which would have necessitated the filing of this motion under seal. Cross-Defendants  
18 have chosen not to avail themselves of this avenue either.

19 As important, we note that federal and state constitutional law preclude the purposeful  
20 concealment of litigation matters from the public without good cause. In effect, what the four  
21 anonymous Plaintiffs/Cross-Defendants have attempted to do by refusing to identify themselves  
22 for the record is to impose a seal on the public's access to their identifications unilaterally without  
23 this Court's approval. This violates the First Amendment to the United States Constitution,  
24 provisions of the California Constitution, and California procedural law:

1 The public has a First Amendment right of access to civil litigation  
2 documents filed in court and used at trial or submitted as a basis  
3 for adjudication. (*NBC Subsidiary (KNBC-TV), Inc. v. Superior*  
4 *Court* (1999) 20 Cal.4th 1178, 1208–1209, fn. 25, 1212 [86 Cal.  
5 Rptr. 2d 778, 980 P.2d 337].) Substantive courtroom proceedings  
6 in ordinary civil cases, and the transcripts and records pertaining  
7 to these proceedings, are “presumptively open.” (*Id.* at p. 1217.)  
8 Therefore, before a trial court orders a record sealed, it must hold  
9 a hearing and make findings that (1) there is an overriding interest  
10 supporting sealing of the records; (2) there is a substantial  
11 probability that absent \*\*\* sealing, such interest will be  
12 prejudiced; (3) the sealing order is narrowly tailored to serve the  
13 overriding interest; and (4) a less restrictive means of meeting that  
14 interest is not available. (*Id.* at pp. 1217–1218.) These standards  
15 are now embodied in our Rules of Court. (Rule 2.550(d), formerly  
16 rule 243.1(d), adopted eff. Jan. 1, 2001, & amended eff. Jan. 1,  
17 2004.)

9 With the passage of Proposition 59 effective November 3, 2004,  
10 the people's right of access to information in public settings now  
11 has state constitutional stature, grounding the presumption of  
12 openness in civil court proceedings with state constitutional roots.  
13 (Cal. Const., art. I, § 3, subd. (b)(1)): “The people have the right of  
14 access to information concerning the conduct of the people's  
15 business, and, therefore, the meetings of public bodies and the  
16 writings of public officials and agencies shall be open to public  
17 scrutiny.”

14 The procedures for filing records under seal are set forth in rule  
15 2.551. Court approval is explicit: “A record must not be filed  
16 under seal without a court order. The court must not permit a  
17 record to be filed under seal based solely on the agreement or  
18 stipulation of the parties.” (Rule 2.551(a).) The party requesting  
19 a sealing order must notice a motion or application, supported by  
20 a memorandum and a declaration of facts sufficient to justify  
21 sealing. (Rule 2.551(b)(1).) The pertinent documents must be  
22 lodged with the court in a sealed envelope labeled  
23 “CONDITIONALLY UNDER SEAL.” (Rule 2.551(d)(2).) If  
24 the motion is granted, the clerk must affix a label prominently  
25 saying “SEALED BY ORDER OF THE COURT ON (DATE).”  
(Rule 2.551(e)(1).) Records remain sealed except by further order  
of the court. (Rule 2.551(h)(1).) Where the motion is denied, the  
clerk must return the lodged documents unless the moving party  
notifies the clerk within 10 days after the denial that the documents  
are to be filed. (Rule 2.551(b)(6).)

23 *Savaglio v. Wal-Mart Stores, Inc.*, 149 Cal. App. 4th 588, 596-97, 57 Cal. Rptr. 3d 215, 221 (Cal.  
24 Ct. App. 2007).

1 In fact, notwithstanding Plaintiffs' arguments as set out in the *ex parte* application seeking  
2 a protective order of anonymity out of fear for their safety, Plaintiffs have provided no actual  
3 facts to suggest that they have any privacy or safety interest overriding the public's interest in  
4 open and transparent court proceedings as guaranteed by the federal and state constitutions.  
5 Plaintiffs/Cross-Defendants have steadfastly ignored the fact that they sought to make this a  
6 public dispute with social media allegations of bigotry directed against Muslims. Based upon  
7 Plaintiffs' own discovery responses, five of the Plaintiffs, which include three of the four  
8 "anonymous" Plaintiffs claiming to fear for their safety, have publicly criticized Defendants and  
9 accused them of bigotry and permitted their pictures to be taken by news outlets. (Yerushalmi  
10 Decl. ¶¶ 4-7; see CBS NEWS, "Women accuse café of kicking them out for being Muslim," May  
11 4, 2016, [http://www.cbsnews.com/news/california-muslim-women-sue-laguna-beach-cafe-](http://www.cbsnews.com/news/california-muslim-women-sue-laguna-beach-cafe-discrimination-police/)  
12 [discrimination-police/](http://www.cbsnews.com/news/california-muslim-women-sue-laguna-beach-cafe-discrimination-police/) [last visited Aug. 10, 2017] [including in the lead picture of the CBS story  
13 three of the four "anonymous" Plaintiffs Yumna H. Hameed, Safa Rawag, and Marwa Rawag]).

14 Indeed, while withheld from Plaintiffs' discovery responses, Urth Caffe located an online  
15 article from a heavily-trafficked website that included Facebook quotes from the fourth  
16 "anonymous" Plaintiff, Sara Soumaya Chamma:

17 Sara Soumaya Chamma, who was with Farsakh on Saturday  
18 evening, offered her own review of the establishment Sunday on  
19 Facebook.

20 "Beautiful location, mediocre boba, all served with a heaping dose  
21 of racism and sexism," she wrote.

22 "All in all the mint coffee was good but not worth the humiliation  
23 and embarrassment dished out upon its arrival," Chamma added.

24 "Save yourself a decent amount of cash and dine elsewhere."

25 HUFFINGTON POST, "Women claim they were kicked out of a café for being Muslim," April 26,  
2016, <https://tinyurl.com/yc66dg4m> [last visited Sept. 9, 2017]). In other words, each of the four  
"anonymous" Plaintiffs/Cross-Defendants have either appeared at press conferences and posed  
for pictures or spoke out publicly on social media platforms only to be quoted by other online

1 media outlets.

2 It is an odd, if not untenable position, to claim a fear of public exposure while exploiting  
3 public exposure to generate a social media firestorm by accusing Defendants of being bigots  
4 engaging in illegal discrimination.

5 Indeed, as noted earlier in the *ex parte* application, only Urth Caffe employees have been  
6 the subject of direct criminal threats, which necessitated the filing of a criminal report by Urth  
7 Caffe management with the FBI and local police and employing armed security to escort  
8 employees to their automobiles at night. (Yerushalmi Decl. ¶ 10.) And, to that point, the specific  
9 criminal threat against the Urth Caffe employee who enforced the 45-minute seating policy was  
10 only possible because Plaintiffs identified him by name in their orchestrated public outrage  
11 campaign. (*See Ex. 1 to Yerushalmi Decl.*)

12 More to the point, the public has a legitimate interest in knowing who has made these  
13 quite public accusations of bigotry against a very popular California business that employs more  
14 than 350 Californians, pays taxes, and materially contributes to the well-being of all Californians.  
15 And, quite frankly, the public has a right to know who these Plaintiffs are who have called for  
16 punitive damages of this California business based upon entirely unsubstantiated claims of anti-  
17 Muslim bigotry.

18 **CONCLUSION**

19 For the foregoing reasons, Cross-Complainants respectfully asks this Court to grant this  
20 motion for leave to file the First Amended Verified Cross-Complaint.

21 DATED: September 6, 2017

AMERICAN FREEDOM LAW CENTER, INC.

22 By:



23 DAVID YERUSHALMI

24 *Attorneys for Defendants/Cross-Complainants*

1           **APPENDIX OF PROPOSED CHANGES TO VERIFIED CROSS-COMPLAINT**

2           Pursuant to California Rules of Court, Rule 3.1324(a)(2)-(3), Cross-Complainants  
3 propose the following amendments to the verified Cross-Complaint.

4           A.     Revise counsel designation on line 4, page 1 to include representation of Cross-  
5 Complainants.

6           B.     Lines 1-5, page 2, in prefatory sentence: add legal names of the four “anonymous”  
7 Plaintiffs.

8           C.     Line 24, page 2, made grammatical edit changing “these” to “this”.

9           D.     Line 12, page 4, make diction edit changing “another” to “a”.

10          E.     Paragraphs 23-29, at pages 6-7, to the allegations describing Cross-Complainants,  
11 add birth dates for all Cross-Complainants, add full names for the four “anonymous” Cross-  
12 Complainants, and add street and city of residence to five of the Cross-Complainants.

13          F.     Change dates on attorney signature and on verification.