

SHORT TITLE TARGET NATIONAL BANK vs.	CASE NUMBER
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4. (Continued)

- b. The true names of defendants sued as Does are unknown to plaintiff
 - (1) One defendant (specify Do# numbers): _____ were the agents or employees of the named defendant and acted within the scope of that agency or employment.
 - (2) Do# defendant (specify Do# numbers): _____ 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 332 are (named):

- 5. Plaintiff is required to comply with a claims statute, and
 - a. has complied with applicable claims statutes, or
 - b. is excused from complying because (specify):

6. This action is subject to Civil Code section 1812.10 Civil Code section 2884.4.

- 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 (specify): Before commencement of this action, in those cases where recovery of costs is dependent on such notices, plaintiff informed the defendant(s) in writing it intended to file this action and that this action would result in a judgment against defendant(s) that would include court costs and necessary disbursements allowed by CCP Section 1033(b)(2)

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

- a. damages of \$ 4,811.60
- b. interest on the damages
 - (1) according to proof
 - (2) at the rate of (specify): 000000% per year from (date):
- c. attorney's fees
 - (1) of \$.00 Pursuant to court schedule, or such other sum
 - (2) according to proof as court may determine.
- d. other (specify): NOTICE TO DEFENDANT(S): All notices, letters, payments, and other papers are to be mailed to plaintiff's attorneys Mann Bracke LLC, until such time, if any, that you receive formal written notice of a change or substitution of attorneys of plaintiff

11. The paragraphs of this pleading alleged or information and belief are as follows (specify paragraph numbers):

Date: 1
 STELIOS A. HARRIS CA# 242116
 MARTIN HOFFMANN CA# 246141
(TYPE OR PRINT NAME)

(SIGNATURE OF PLAINTIFF OR ATTORNEY)

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



file #
P15

1 I, the undersigned, certify and declare that I have read
 2 the foregoing complaint. I am an attorney and an employee of
 3 Mann Bracken LLC, the attorneys for plaintiff. Plaintiff
 4 is absent from the county where Mann Bracken LLC, has its
 5 offices and is therefore unable to verify the complaint. For
 6 that reason, I am making this verification for and on behalf
 7 of that party. Except as to paragraph 7 of the complaint, I am
 8 informed and believe and on that ground allege that the matters
 9 stated in said document are true. As to paragraph 7 of the
 10 complaint, I have read that paragraph and know the contents
 11 thereof. The same is true of my knowledge and on the basis of
 12 the business records of plaintiff and my review of available
 13 factual information.

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

16 Executed on 2008 , at Concord, California.

18 STELIOS A. HARRIS CA# 242116
 19 MARTIN HOFFMANN CA# 248141

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