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Attorneys for Plaintiff
PETER ENGLANDER

F I L E D
Superior Court of California
County of San Francisco

JAN 09 2017

CLERK OF THE COURT
BY: Arlene Ramon
Deputy Clerk

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN FRANCISCO
UNLIMITED CIVIL JURISDICTION

PETER ENGLANDER,

Plaintiff,

v.

LYMAN PRODUCTS CORPORATION and
DOES 1-150, inclusive,

Defendants.

CGC-17-556317

Case No. _____

**COMPLAINT FOR CIVIL PENALTIES
AND INJUNCTIVE RELIEF**

(Health & Safety Code § 25249.5 et seq.)

By Fax

1 **NATURE OF THE ACTION**

2 1. This Complaint is a representative action brought by plaintiff Peter Englander in
3 the public interest of the citizens of the State of California. Plaintiff brings this action to
4 enforce the People's right to be informed of the health hazards caused by exposures to lead, a
5 toxic chemical found in and on brass hammer pins sold by defendants in California.

6 2. By this Complaint, plaintiff seeks to remedy defendants' continuing failure to
7 warn individuals not covered by California's Occupational Safety Health Act, Labor Code
8 section 6300 et seq., who purchase, use, or handle defendants' products, about the risks of
9 exposure to lead present in and on brass hammer pins manufactured, distributed, and/or offered
10 for sale or use throughout the State of California. Individuals not covered by California's
11 Occupational Safety Health Act, Labor Code section 6300 et seq., who purchase, use or handle
12 defendants' products, are referred to hereinafter as "consumers."

13 3. Detectable levels of lead are found in and on the brass hammer pins that
14 defendants manufacture, distribute, and offer for sale to consumers and other individuals
15 throughout California.

16 4. Under the Safe Drinking Water and Toxic Enforcement Act of 1986, codified at
17 Health and Safety Code section 25249.6 et seq. ("Proposition 65"), "[n]o person in the course of
18 doing business shall knowingly and intentionally expose any individual to a chemical known to
19 the state to cause cancer or reproductive toxicity without first giving clear and reasonable
20 warning to such individual . . ." Health & Safety Code § 25249.6.

21 5. Pursuant to Proposition 65, on February 27, 1987, California listed lead as a
22 chemical known to cause birth defects or other reproductive harm. Lead became subject to the
23 "clear and reasonable warning" requirements of the act one year later on February 27, 1988.
24 Cal. Code Regs. tit. 27, § 27001(c); Health & Safety Code §§ 25249.8 & 25249.10(b).
25 Defendants manufacture, distribute, import, sell, and offer for sale without health hazard warnings
26 in California, brass hammer pins that contain lead including, but not limited to, the pins offered in
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1 connection with the *Lyman Brass Tapper Hammer, Item #7031290, UPC #0 11516 81290* 2. All
2 such brass hammer pins containing lead are referred to hereinafter as "PRODUCTS."

3 6. Defendants' failure to warn consumers in the State of California of the health
4 hazards associated with exposures to lead in conjunction with defendants' sales of the
5 PRODUCTS are violations of Proposition 65, and subject defendants, and each of them, to
6 enjoinder of such conduct as well as civil penalties for each violation. Health & Safety Code
7 § 25249.7(a) & (b)(1).

8 7. For defendants' violations of Proposition 65, plaintiff seeks preliminary and
9 permanent injunctive relief to compel defendants to provide consumers of the PRODUCTS with
10 the required warning regarding the health hazards associated with exposures to lead. Health &
11 Safety Code § 25249.7(a).

12 8. Pursuant to Health and Safety Code section 25249.7(b), plaintiff also seeks civil
13 penalties against defendants for their violations of Proposition 65.

14 PARTIES

15 9. Plaintiff PETER ENGLANDER, is a citizen of the State of California who is
16 dedicated to protecting the health of California citizens through the elimination or reduction of
17 toxic exposures from consumer products; and he brings this action in the public interest
18 pursuant to Health and Safety Code section 25249.7(d).

19 10. Defendant LYMAN PRODUCTS CORPORATION ("LYMAN") is a person in
20 the course of doing business within the meaning of Health and Safety Code sections 25249.6
21 and 25249.11.

22 11. LYMAN manufactures, imports, distributes, sells, and offers the PRODUCTS for
23 sale or use in the State of California, or implies by its conduct that it manufactures, imports,
24 distributes, sells, and offers the PRODUCTS for sale or use in the State of California.

25 12. Defendants DOES 1-50 ("MANUFACTURER DEFENDANTS") are each a
26 person in the course of doing business within the meaning of Health and Safety Code sections
27 25249.6 and 25249.11.

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1 13. **MANUFACTURER DEFENDANTS**, and each of them, research, test, design,
2 assemble, fabricate, and manufacture, or imply by their conduct that they research, test, design,
3 assemble, fabricate, and manufacture one or more of the **PRODUCTS** offered for sale or use in
4 California.

5 14. Defendants **DOES 51-100** (“**DISTRIBUTOR DEFENDANTS**”) are each a person
6 in the course of doing business within the meaning of Health and Safety Code sections 25249.6
7 and 25249.11.

8 15. **DISTRIBUTOR DEFENDANTS**, and each of them, distribute, exchange,
9 transfer, process, and transport one or more of the **PRODUCTS** to individuals, businesses, or
10 retailers for sale or use in the State of California, or imply by their conduct that they distribute,
11 exchange, transfer, process, and transport one or more of the **PRODUCTS** to individuals,
12 businesses, or retailers for sale or use in the State of California.

13 16. Defendants **DOES 101-150** (“**RETAILER DEFENDANTS**”) are each a person in
14 the course of doing business within the meaning of Health and Safety Code sections 25249.6
15 and 25249.11.

16 17. **RETAILER DEFENDANTS**, and each of them, offer the **PRODUCTS** for sale to
17 consumers and other individuals in the State of California.

18 18. At this time, the true names of defendants **DOES 1** through **150**, inclusive, are
19 unknown to plaintiff, who, therefore, sues said defendants by their fictitious names pursuant to
20 Code of Civil Procedure section 474. Plaintiff is informed and believes, and on that basis
21 alleges, that each of the fictitiously named defendants is responsible for the acts and occurrences
22 alleged herein. When ascertained, their true names shall be reflected in an amended complaint.

23 19. **LYMAN, MANUFACTURER DEFENDANTS, DISTRIBUTOR**
24 **DEFENDANTS**, and **RETAILER DEFENDANTS** shall hereinafter collectively be referred to
25 as “**DEFENDANTS.**”
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1 **VENUE AND JURISDICTION**

2 20. Venue is proper in the Superior Court for the County of San Francisco pursuant to
3 Code of Civil Procedure sections 393, 395, and 395.5, because this Court is a court of
4 competent jurisdiction, because plaintiff seeks civil penalties against DEFENDANTS, because
5 one or more instances of wrongful conduct occurred, and continue to occur, in this county,
6 and/or because DEFENDANTS conducted, and continue to conduct business in San Francisco
7 with respect to the PRODUCTS.

8 21. The California Superior Court has jurisdiction over this action pursuant to
9 California Constitution Article VI, section 10, which grants the Superior Court "original
10 jurisdiction in all causes except those given by statute to other trial courts." The statute under
11 which this action is brought does not specify any other basis of subject matter jurisdiction.

12 22. The California Superior Court has jurisdiction over DEFENDANTS based on
13 Plaintiff's information and good faith belief that DEFENDANTS are each a person, firm,
14 corporation or association that is a citizen of the State of California, has sufficient minimum
15 contacts in the State of California, and/or otherwise purposefully avails itself of the California
16 market. DEFENDANTS' purposeful availment renders the exercise of personal jurisdiction by
17 California courts consistent with traditional notions of fair play and substantial justice.

18 **FIRST CAUSE OF ACTION**

19 **(Violation of Proposition 65 - Against All Defendants)**

20 23. Plaintiff realleges and incorporates by reference, as if fully set forth herein,
21 Paragraphs 1 through 22, inclusive.

22 24. In enacting Proposition 65, in the preamble to the Safe Drinking Water and Toxic
23 Enforcement Act of 1986, the People of California expressly declared their right "[t]o be
24 informed about exposures to chemicals that cause cancer, birth defects, or other reproductive
25 harm."

26 25. Proposition 65 states, "[n]o person in the course of doing business shall
27 knowingly and intentionally expose any individual to a chemical known to the state to cause
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1 cancer or reproductive toxicity without first giving clear and reasonable warning to such
2 individual” Health & Safety Code § 25249.6.

3 26. On October 28, 2016, plaintiff served a sixty-day notice of violation together with
4 an accompanying certificate of merit, on LYMAN, the California Attorney General’s Office,
5 and all other requisite public enforcement agencies alleging that, as a result of DEFENDANTS’
6 sales of the PRODUCTS, consumers and other individuals in the State of California are being
7 exposed to lead resulting from their reasonably foreseeable use of the PRODUCTS, without the
8 consumers first receiving a “clear and reasonable warning” regarding the harms associated with
9 exposures to lead, as required by Proposition 65.

10 27. DEFENDANTS manufacture, import, distribute, sell, and offer the PRODUCTS
11 for sale or use in violation of Health and Safety Code section 25249.6, and DEFENDANTS’
12 violations have continued beyond their receipt of plaintiff’s sixty-day notice of violation. As
13 such, DEFENDANTS’ violations are ongoing and continuous in nature and, unless enjoined
14 will continue in the future.

15 28. After receiving plaintiff’s sixty-day notice of violation, no public enforcement
16 agency has commenced and diligently prosecuted a cause of action against DEFENDANTS
17 under Proposition 65 to enforce the alleged violations that are the subject of plaintiff’s notice of
18 violation.

19 29. The PRODUCTS that DEFENDANTS manufacture, import, distribute, sell, and
20 offer for sale or use in California expose consumers and other individuals to lead, resulting from
21 their reasonably foreseeable use of the PRODUCTS. Such exposures caused by DEFENDANTS
22 and endured by consumers in California are not exempt from the “clear and reasonable” warning
23 requirements of Proposition 65, yet DEFENDANTS provide no clear and reasonable warning.
24 DEFENDANT’S violations of Proposition 65 as a result of their failure to provide warnings to
25 consumers and other individuals exposed to lead from the PRODUCTS in violation of Proposition
26 65 have continued since as far back as October 28, 2013.

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1 30. DEFENDANTS know or should know that the PRODUCTS they manufacture,
2 import, distribute, sell, and offer for sale in California contain lead.

3 31. Lead is present in or on the PRODUCTS in such a way as to expose consumers
4 through dermal contact and/or ingestion during reasonably foreseeable use.

5 32. The normal and reasonably foreseeable use of the PRODUCTS has caused, and
6 continues to cause, consumer exposures to lead, as defined by title 27 of the California Code of
7 Regulations, section 25602(b).

8 33. DEFENDANTS know that the normal and reasonably foreseeable use of the
9 PRODUCTS exposes consumers and other individuals to lead through dermal contact and/or
10 ingestion.

11 34. DEFENDANTS intend for such exposures to lead from the reasonably
12 foreseeable use of the PRODUCTS to occur by their deliberate, non-accidental participation in
13 the manufacture, importation, distribution, sale, and offering of the PRODUCTS for sale or use
14 to consumers in California.

15 35. DEFENDANTS failed to provide a "clear and reasonable warning" to those
16 consumers and other individuals in California who have been, or who will be, exposed to lead
17 through dermal contact and/or ingestion resulting from their use of the PRODUCTS.

18 36. Contrary to the express policy and statutory prohibition of Proposition 65 enacted
19 directly by California voters, consumers exposed to lead through dermal contact and/or
20 ingestion as a result of their use of the PRODUCTS that DEFENDANTS sold without a "clear
21 and reasonable" health hazard warning, have suffered, and continue to suffer, irreparable harm
22 for which they have no plain, speedy, or adequate remedy at law.

23 37. Pursuant to Health and Safety Code section 25249.7(b), as a consequence of the
24 above-described acts, DEFENDANTS, and each of them, are liable for a maximum civil penalty
25 of \$2,500 per day for each violation.

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1 38. As a consequence of the above-described acts, Health and Safety Code
2 section 25249.7(a) also specifically authorizes the Court to grant injunctive relief against
3 DEFENDANTS.

4 **PRAYER FOR RELIEF**

5 Wherefore, plaintiff prays for judgment against DEFENDANTS as follows:

6 1. That the Court, pursuant to Health and Safety Code section 25249.7(b), assess
7 civil penalties against DEFENDANTS, and each of them, in the amount of \$2,500 per day for
8 each violation;

9 2. That the Court, pursuant to Health and Safety Code section 25249.7(a),
10 preliminarily and permanently enjoin DEFENDANTS from manufacturing, distributing, or
11 offering the PRODUCTS for sale or use in California without first providing a “clear and
12 reasonable warning” in accordance with title 27 of the California Code of Regulations, section
13 25601 *et seq.*, regarding the harms associated with exposures to lead;

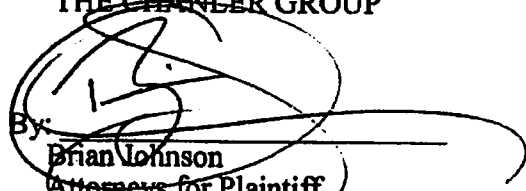
14 3. That the Court, Pursuant to Health and Safety Code section 25249.7(a), issue
15 preliminary and permanent injunctions mandating that DEFENDANTS recall all PRODUCTS
16 currently in the chain of commerce in California without a “clear and reasonable warning” as
17 defined by California Code of Regulations title 27, section 25601 *et seq.*;

18 4. That the Court grant plaintiff his reasonable attorneys’ fees and costs of suit; and

19 5. That the Court grant such other and further relief as may be just and proper.
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21 Dated: January 9, 2017

22 Respectfully submitted,
23 THE CHANLER GROUP

24 By: 
25 Brian Johnson
26 Attorneys for Plaintiff
27 PETER ENGLANDER
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ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Brian C. Johnson, State Bar No. 235965 THE CHANLER GROUP 2560 Ninth Street, Suite 214 Berkeley, CA 94710 TELEPHONE NO.: (510) 848-8880 FAX NO.: (510) 848-8118 ATTORNEY FOR (Name): Plaintiff, Peter Englander	FILED FOR COURT USE ONLY Superior Court of California County of San Francisco JAN 09 2017 CLERK OF THE COURT BY: <u>Adeline Ramon</u> Deputy Clerk
SUPERIOR COURT OF CALIFORNIA, COUNTY OF San Francisco STREET ADDRESS: 400 McAllister St MAILING ADDRESS: CITY AND ZIP CODE: San Francisco, 94102 BRANCH NAME: Unlimited Civil Jurisdiction	CASE NAME: Peter Englander v. Lyman Products Corporation, et al.
CIVIL CASE COVER SHEET <input checked="" type="checkbox"/> Unlimited (Amount demanded exceeds \$25,000) <input type="checkbox"/> Limited (Amount demanded is \$25,000 or less)	Complex Case Designation <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)
	CASE NUMBER: CGC-17-556317 JUDGE: DEPT:

Items 1-6 below must be completed (see instructions on page 2).

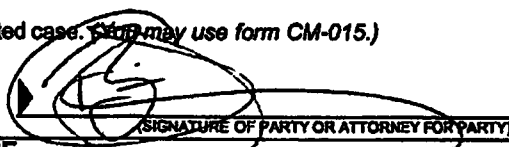
1. Check one box below for the case type that best describes this case:

Auto Tort <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) Other PIPD/WD (Personal Injury/Property Damage/Wrongful Death) Tort <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other PIPD/WD (23) Non-PIPD/WD (Other) Tort <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-PIPD/WD tort (35) Employment <input type="checkbox"/> Wrongful termination (38) <input type="checkbox"/> Other employment (15)	Contract <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37) Real Property <input type="checkbox"/> Eminent domain/Inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) Unlawful Detainer <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) Judicial Review <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (38)	Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403) <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20) Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input checked="" type="checkbox"/> Other complaint (not specified above) (42) Miscellaneous Civil Petition <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)
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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. <input type="checkbox"/> Large number of separately represented parties | d. <input type="checkbox"/> Large number of witnesses |
| b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve | e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court |
| c. <input type="checkbox"/> Substantial amount of documentary evidence | f. <input type="checkbox"/> 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): **One (1)**
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: January 9, 2017
 Brian C. Johnson

(TYPE OR PRINT NAME)


 (SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE

- 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.

By Fax

INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

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 PIPD/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 PIPD/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 PIPD/WD

Non-PIP/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-PIP/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 Late Claim
- Other Civil Petition