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13 **UNLIMITED JURISDICTION**  
14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
15 **FOR THE COUNTY OF LOS ANGELES – NORTH DISTRICT**

16 TATIANA CHAHOIAN,  
17  
18 Plaintiff,

19 vs.

20 COUNTY OF LOS ANGELES, a  
21 municipality, GEORGE GASCÓN, in his  
22 official and individual capacities, and  
23 DOES 1 to 49, inclusive,

24 Defendants.

Case No.

**COMPLAINT FOR DAMAGES AND  
INJUNCTIVE RELIEF:**

1. **WHISTLEBLOWER RETALIATION  
(LABOR CODE § 1102.5)**
2. **INTENTIONAL INFLECTION OF  
EMOTIONAL DISTRESS**
3. **DISABILITY DISCRIMINATION –  
FAILURE TO ACCOMMODATE (GOV.  
CODE, § 12940(m))**
4. **DISABILITY DISCRIMINATION –  
FAILURE TO ENGAGE IN  
INTERACTIVE PROCESS (GOV.  
CODE 12940(n))**

**DEMAND FOR JURY TRIAL**

1 Plaintiff Tatiana Chahoian (“Plaintiff” or “Chahoian”), by and through her attorneys, Dhillon  
2 Law Group Inc., brings this action against Defendants County of Los Angeles (also referred to as “Los  
3 Angeles County”), George Gascón, in both his official and individual capacities, and DOES 1 to 49  
4 (collectively, “Defendants”), seeking damages and injunctive relief for whistleblower retaliation (Lab.  
5 Code, § 1102.5), intentional infliction of emotional distress, and disability discrimination, and alleges  
6 as follows:

## 7 INTRODUCTION

8 1. This case concerns a victim of the systemic culture of retaliation and lawlessness within  
9 the Los Angeles County District Attorney’s Office (“LADA”), in which laws passed to promote public  
10 safety are flagrantly disregarded or ignored by the very people sworn to uphold them, and those who  
11 speak up against this perverse abuse of the public trust are subjected to intimidation, retaliation, and  
12 workplace hostility.

13 2. Specifically, it involves Deputy District Attorney (“DDA”) Tatiana Chahoian, a  
14 prosecutor who notified the public about dangerous new instructions being advanced by District  
15 Attorney George Gascón.

16 3. As a direct result of Chahoian’s public statements, Gascón dispatched armed LADA  
17 investigators to her home—where she was working remotely while watching her children—with a non-  
18 urgent notice of supposed policy violations. Although many LADA employees publicly criticized  
19 Gascón’s policies, only Chahoian received a hand-delivered notice by armed officers. Directed by  
20 Gascón, this tactic was designed to intimidate and silence her for disclosing unlawful and unethical  
21 conduct.

22 4. Following this incident, on April 17 and 18, 2024, Gascón continued to retaliate against  
23 Chahoian by denying her promotion. Chahoian was the only eligible DDA from her class whom Gascón  
24 passed over for promotion. Gascón even promoted DDAs from the class hired after Chahoian to Grade  
25 III because he needed to fill additional vacancies. And out of more than 70 filing deputies employed by  
26 LADA, Chahoian is the only one ranked as “Grade II” in the LADA hierarchy; all other filing deputies  
27 are either Grade III or Grade IV, reflecting the experience and judgment required for the position.  
28



1 **JURISDICTION AND VENUE**

2 11. Jurisdiction is proper in the County of Los Angeles because it has general subject matter  
3 jurisdiction and no statutory exceptions to jurisdiction exist.

4 12. Venue is proper in this Court pursuant to County of Los Angeles Local Rule (“L.R.”)  
5 2.3(a)(1)(B) because the employment contract at issue was performed in the North District of Los  
6 Angeles County.

7 **FACTUAL ALLEGATIONS**

8 13. Tatiana Chahoian graduated from the University of Southern California in 2013, and  
9 received her law degree from Loyola Law School in 2016, with a concentration in Criminal Justice.

10 14. Upon graduating law school, LADA hired Chahoian as a law clerk.

11 15. From 2017 to 2019, Chahoian worked as a private criminal defense attorney.

12 ***Chahoian Begins Her Career with LADA***

13 16. On April 4, 2019, LADA hired Chahoian as a Deputy District Attorney.

14 17. Throughout her ongoing tenure with LADA, Chahoian has performed a preliminary  
15 hearing assignment at the Van Nuys Office, two misdemeanor trial assignments at the Glendale Office  
16 and Santa Clarita Office, respectively, and a misdemeanor and felony trial assignment at the Antelope  
17 Valley Office.

18 18. At the start of her career, Chahoian was thrilled at the chance to serve her local  
19 community while working for the largest prosecutorial office in the nation.

20 19. But her job radically changed when George Gascón took over as DA on December 7,  
21 2020. Under Gascón, LADA adopted a host of lenient policies that many prosecutors believed placed  
22 the interests of the accused over those of the victim. Although Chahoian, like a majority of her  
23 colleagues, took issue with many of Gascón’s directives, she did her best to follow them to the extent  
24 that doing so would not conflict with the law or her prosecutorial oath to protect the public.

25 ***LADA Fails to Accommodate Chahoian’s Health Issues***

26 20. In April 2022, Chahoian experienced symptoms of a seizure when driving home from  
27 work. She then took six weeks of medical leave to recover.

1           21.     When Chahoian returned to work, understaffing at the Antelope Valley Office led to her  
2 being assigned an overwhelming workload. She was assigned to two misdemeanor courtrooms per day,  
3 and handled between 30 and 50 cases per courtroom.

4           22.     To illustrate this demanding schedule, Chahoian’s presence was required in so many  
5 places that she could not even use the restroom without first asking permission.

6           23.     In May 2023, Chahoian was assigned a felony trial where the defendant faced up to 20  
7 years in prison if convicted, while simultaneously managing misdemeanor courts in the mornings and  
8 preparing for trial late into the night. Even for a prosecutor like Chahoian, who is accustomed to working  
9 long hours, the stress of this extreme workload exacerbated her preexisting health issues.

10          24.     Consequently, Chahoian experienced severe anxiety, depression, and chronic fatigue,  
11 frequently feeling as if she was going to faint.

12          25.     During this period, Chahoian’s weight dropped to 89 pounds, down 21 pounds from her  
13 usual weight of 110 pounds.

14          26.     Despite raising these issues with LADA management and the Association of Deputy  
15 District Attorneys, and highlighting that some DDAs in Antelope Valley were not assigned to multiple  
16 courtrooms while others were not assigned to any courtroom, LADA took no action to accommodate  
17 Chahoian’s documented health issues.

18          27.     Unsurprisingly, in July 2023, Chahoian was forced to request another medical leave to  
19 address her health issues.

20          28.     Chahoian’s doctors informed her that extreme stress was the cause of her chronic health  
21 problems, and prescribed her antidepressants and anti-anxiety medication.

22          29.     Chahoian returned to work in September 2023, but the ongoing understaffing at the  
23 Antelope Valley Office made her work just as challenging, if not more challenging, than it had been  
24 before.

25          30.     In October 2023, Chahoian was again compelled to take medical leave in order to  
26 recover.

27

28

1           31.     When Chahoian returned to work on November 22, 2023, she sent LADA’s Employee  
2 Relations division a note from her doctor stating that her driving should be restricted to no more than 15  
3 minutes at a time due to the frequent symptoms that occurred during her commute.

4           32.     For the first three days following Chahoian’s return from medical leave, her Head Deputy  
5 respected her doctor’s instructions and allowed her to work from home.

6           33.     But after these first few days, short staffing at the Antelope Valley Office and a limited  
7 amount of available remote work compelled Chahoian to resume her commute to the office.

8           34.     Meanwhile, Chahoian anxiously awaited word from LADA on how it would  
9 accommodate her doctor’s instructions regarding her health issues.

10          35.     On November 29, 2023, LADA held an interactive meeting regarding Chahoian’s request  
11 to reduce her commute time, but adopted no immediate solution.

12          36.     On December 4, Chahoian requested an update on the status of her accommodations and  
13 submitted a specific request that she be transferred to the Charge Evaluation Division (“CED”) as a  
14 Filing Deputy.

15          37.     LADA did not update Chahoian on the status of her request until December 6—one week  
16 after her initial meeting, and two weeks after she had submitted her doctor’s instructions—when she was  
17 invited to a virtual meeting the following day with Priscilla Musso, acting director of LADA’s Employee  
18 Relations Division, and Silva Mamarbashi, LADA’s Alternate ADA Coordinator.

19          38.     During the meeting on December 7, Chahoian was informed, for the first time, that her  
20 doctor needed to fill out a medical questionnaire for her accommodations request to be evaluated.

21          39.     Finally, on December 18, 2023, after three separate medical leaves and over a year of  
22 emotional and physical suffering, LADA acquiesced to Chahoian’s request that she be transferred to  
23 CED as a Filing Deputy. By then, LADA had required Chahoian to commute to the Antelope Valley  
24 Office—a roughly 55-minute drive each way—for nearly four weeks *after* it had received a signed note  
25 from her doctor stating that her health did not permit her to drive for more than 15 minutes at a time.

26          40.     Once Chahoian began her position at CED, Chahoian performed exceptionally well,  
27 quickly clearing the backlog of cases and receiving positive feedback from LADA Staff, her Assistant  
28 Head Deputy Rose DeMattia, and various Sheriff’s Department detectives.



1 would have to disobey Gascón and risk any undesirable repercussions on their careers that may result.  
2 The predictable outcome was that filing deputies, like most employees in any industry, would heed their  
3 boss's direction, even when that direction was communicated informally rather than being memorialized  
4 as an official department policy.

5 47. However, Chahoian reasonably understood that Gascón's "encouragement" to avoid  
6 filing the appropriate charges violated **Government Code § 26540** ("A district attorney shall not during  
7 his incumbency . . . assist in the defense of . . . any person accused of any crime in any county"); **ABA**  
8 **Standards for Criminal Justice: Prosecution Function, 3-1.2, Functions and Duties of the**  
9 **Prosecutor** ("The primary duty of the prosecutor is to seek justice within the bounds of the law . . . The  
10 prosecutor serves the public interest and should act with integrity and balanced judgment to increase  
11 public safety. . . . The prosecutor should avoid an appearance of impropriety in performing the  
12 prosecution function"); and **Marsy's law** (Cal. Const., Art. 1, § 28) ("[R]elevant evidence shall not be  
13 excluded in any criminal proceeding, including pretrial and post-conviction motions and hearings, or in  
14 any trial or hearing of a juvenile for a criminal offense, whether heard in juvenile or adult court").

15 48. Alarmed by the dangers posed by Gascón's unlawful "encouragement," Chahoian sought  
16 to notify the public.

### 17 *Chahoian Goes Public*

18 49. On February 26, 2024, Chahoian recorded an interview with Gina Silva of Fox 11 Los  
19 Angeles in which she discussed LADA's email encouraging DDAs to avoid filing appropriate charges  
20 in cases of reckless driving, street racing, or street takeovers, and to instead file such cases as PDP.<sup>1</sup>

21 50. At no point in the interview or in any public statement did Chahoian claim that Gascón  
22 issued a formal policy *prohibiting* charges for reckless driving or street takeovers, or *mandating* that  
23 such cases be filed as PDP. Rather, she has consistently maintained that Gascón's encouragement to  
24 avoid filing these charges where appropriate was itself unlawful.

25 51. The following day, Chahoian sent an email to DA Gascón explaining that she strongly  
26 disagreed with his email and felt compelled to speak to the media as a whistleblower. Nothing could  
27 have prepared her for Gascón's response.

28 <sup>1</sup> "Prosecutors pressured to not file charges in street racing cases: Deputy DA," Fox 11 Los Angeles (Feb. 27, 2024),  
YouTube <https://www.youtube.com/watch?v=-wACbNZQlp0> (accessed June 4, 2024).



*Gascón Attempts to Intimidate Chahoian*

1  
2           52.     On February 28, 2024, Chahoian was working from home when she received a panicked  
3 phone call from her husband telling her not to open the door. After receiving a notification from the  
4 family’s Ring doorbell system, her husband had observed strangers suspiciously pacing back-and-forth  
5 in front of their home. Chahoian’s husband advised her to bring her firearm for self-defense if she felt  
6 the need to answer the door.

7           53.     When she peered outside to assess the situation, Chahoian immediately recognized that  
8 the unknown individuals had arrived in law enforcement vehicles. Assuming that the visit must have  
9 been work-related, she dropped her guard and opened the door.

10          54.     To Chahoian’s surprise, Gascón had sent armed LADA investigators to her home for the  
11 purpose of hand-delivering a notice stating she had violated LADA policies by participating in the Fox  
12 11 interview.

13          55.     Notably, the letter did not set forth any disciplinary actions—it was simply a notice of  
14 alleged violations of LADA policy.

15          56.     These accusations of policy violations against Chahoian were baseless and served as a  
16 pretext to justify the retaliatory actions later taken by Gascón and LADA.

17          57.     Of the many DDAs who have made public statements critical of Gascón’s policies, none  
18 have had LADA investigators hand-deliver a notice to their home. This glaring discrepancy underscores  
19 the retaliatory motive behind LADA’s actions taken against Chahoian.

20          58.     Simply put, there is no conceivable reason other than intimidation for Gascón to have  
21 directed that the notice be hand-delivered when it could have easily been sent via email or postal mail.

22          59.     This intimidation tactic by Gascón had its desired effect—Chahoian understandably  
23 developed a fear that she was being watched, and experienced severe and debilitating emotional distress.  
24 She feared for her son’s safety and waited after dropping him off at school to ensure no one was  
25 following him. Even during trips to the pharmacy, she felt the need to look over her shoulder to ensure  
26 that her medical privacy was not being compromised.

27          60.     Further, the distress caused by Gascón’s intimidation exacerbated Chahoian’s existing  
28 health conditions, leading to chronic fatigue, severe anxiety, and weight gain.

1           61.     The same day that LADA investigators appeared unannounced at her home, Chahoian  
2 received a follow up text from Silva of Fox 11 asking how she was doing. When Chahoian informed her  
3 of Gascón’s intimidation tactic, Silva asked if she would be willing to sit for another interview to discuss  
4 it. After much contemplation, Chahoian concluded that the best way to get Gascón to stop his harassment  
5 was to publicize it. She agreed to do a second interview on February 29, 2024, where she exposed  
6 Gascón’s intimidation tactic of sending investigators to her home.<sup>2</sup>

7           62.     On March 1, 2024, Chahoian filed a California State Bar Complaint against Gascón  
8 based on the tactics he employed in attempting to silence her.

9           63.     To date, she has not received a response from the State Bar.

10          64.     On March 6, 2024, Chahoian met with her supervisors, Harlan and DeMattia, as  
11 requested by the hand-delivered notice.

12          65.     Chahoian’s supervisors were genuinely perplexed as to what the meeting was supposed  
13 to cover, so they just spent 49 minutes going through the headings of the LADA Filing Manual. They  
14 did not even discuss the media policy violations outlined in the hand-delivered notice.

15          66.     In short, the meeting was unproductive and a waste of time for all involved, and further  
16 revealed that Gascón’s hand-delivered notice had no practical purpose other than to intimidate Chahoian.

17                           ***Gascón Retaliates Against Chahoian by Denying Her Promotion***

18          67.     On April 17 and 18, 2024, Gascón made promotion calls to 33 DDAs, advising them of  
19 their promotion from Grade II to Grade III.

20          68.     Chahoian was the only eligible DDA from her class whom Gascón passed over for  
21 promotion. Some DDAs from the class hired *after* Chahoian were even promoted to Grade III because  
22 of additional vacancies.

23          69.     The close temporal proximity between Chahoian’s interview with Fox 11 and the  
24 retaliatory actions—including the home visit and the denial of her promotion—clearly indicates that  
25 these actions were motivated by her whistleblower activities.  
26  
27

28 <sup>2</sup> “LA County DA George Gascón accused of using ‘mafia tactics’,” Fox 11 Los Angeles (Mar. 1, 2024), YouTube  
<https://www.youtube.com/watch?v=gMwbAFbaJQc> (accessed June 4, 2024).



1 believed these directives were violations of laws designed to protect public safety, including policies  
2 that should not have been compromised by political agendas. These disclosures were made in good faith,  
3 as she had reasonable cause to believe the directives violated California law and public safety standards.

4 78. Immediately following her public disclosures, Defendants engaged in a series of  
5 retaliatory actions. On February 28, 2024—just two days after her interview—Gascón, acting on behalf  
6 of LADA, sent armed investigators to Chahoian’s home to hand-deliver a notice accusing her of  
7 violating LADA policies by participating in the Fox 11 interview. This notice, which included neither  
8 disciplinary action nor legitimate policy violations, could have been delivered by less invasive means  
9 such as email or mail, and was clearly intended to intimidate and harass her. This visit was an unjustified  
10 retaliatory act aimed at silencing her for exercising her right to disclose information she reasonably  
11 believed violated the law.

12 79. On April 17 and 18, 2024, Gascón made promotion calls to 33 Deputy District Attorneys,  
13 notifying them of their promotion from Grade II to Grade III. Chahoian, despite being fully eligible and  
14 having received a perfect score on the promotion exam, was intentionally passed over. She was the only  
15 eligible DDA from her class to be denied a promotion, while less experienced colleagues were promoted.  
16 This action was clearly a retaliatory measure taken in response to her whistleblower disclosures.

17 80. The close temporal proximity between Chahoian’s protected disclosures and the adverse  
18 employment actions demonstrate that her whistleblowing activities were a substantial motivating factor  
19 in the LADA’s decision to retaliate.

20 81. As a direct result of these retaliatory actions, Chahoian has suffered financial harm,  
21 including lost wages and benefits due to the denial of her promotion. She has also experienced severe  
22 emotional distress, including anxiety, fear for her safety, and exacerbation of her existing health issues.  
23 These harms are directly attributable to LADA’s retaliatory actions and its attempt to punish her for  
24 exposing unlawful directives.

25 //  
26 //  
27 //

**SECOND CAUSE OF ACTION**  
**Intentional Infliction of Emotional Distress**  
**(Against All Defendants)**

82. Chahorian incorporates every allegation contained in the preceding paragraphs, as though set forth fully herein.

83. LADA and George Gascón deliberately engaged in a campaign of intimidation and harassment against Chahorian with the intent or reckless disregard of causing her severe emotional distress.

84. Defendants' conduct in sending armed officers to Chahorian's home was entirely devoid of any legitimate purpose. The reasons Defendants provided for this intimidation technique—alleged policy violations—were pretextual, as evidenced by the fact that no other similarly situated DDAs who voiced concerns about Gascón's policies were subjected to such extreme measures. The sole purpose of these actions was to retaliate against Chahorian for her whistleblower activities, making the conduct all the more outrageous.

85. These actions were not only outrageous but also calculated to inflict severe emotional distress. As a result, Chahorian experienced a drastic decline in her mental and physical health, including severe anxiety, depression, weight fluctuations, and a compromised immune system. The stress from these actions directly impacted her ability to perform her job and maintain her well-being.

86. Defendants were fully aware of the emotional and physical toll their actions would likely have on Chahorian, given her well-documented health issues and the nature of the retaliation she was facing. Despite this knowledge, they chose to proceed with actions designed to intimidate and humiliate her. This demonstrates not only a reckless disregard for her well-being but also a malicious intent to inflict emotional distress.

87. Gascón's conduct was a substantial factor in causing this severe emotional distress, and it was done with malicious intent, warranting an award of punitive damages against Gascón.

1 **THIRD CAUSE OF ACTION**

2 **Disability Discrimination – Failure to Accommodate (Gov. Code, § 12940(m))**

3 **(Against Defendant County of Los Angeles)**

4 88. Chahoian incorporates every allegation contained in the preceding paragraphs, as  
5 though set forth fully herein.

6 89. LADA was fully aware of Chahoian’s medical condition that caused seizures and  
7 restricted her ability to drive for more than 15 minutes at a time.

8 90. On November 22, 2023, after returning from medical leave, Chahoian submitted a  
9 doctor’s note to LADA’s Employee Relations division, clearly stating that her driving should be  
10 restricted to no more than 15 minutes at a time due to her condition. Despite this clear medical directive,  
11 LADA did not take immediate action to accommodate her needs.

12 91. For the first three days following her return, from November 22 to November 24, 2023,  
13 Chahoian was permitted to work from home, respecting her doctor’s instructions. However, starting on  
14 November 27, 2023, she was forced to resume commuting to the Antelope Valley Office, a roughly 55-  
15 minute drive each way, due to short staffing and a lack of available remote work.

16 92. On December 4, 2023, frustrated by the lack of accommodation, Chahoian submitted a  
17 formal request for reassignment to the CED as a Filing Deputy, a position that would significantly reduce  
18 her commute time and align with her medical restrictions.

19 93. LADA did not respond to this request until December 7, 2023, when she was informed  
20 that her doctor needed to complete additional medical documentation. Despite the urgency of her  
21 medical needs, it wasn’t until December 18, 2023—nearly a month after she provided her initial doctor’s  
22 note—that LADA finally accommodated her request and transferred her to the CED position.

23 94. The accommodation requested by Chahoian—a transfer to the CED to reduce her  
24 commute—was both reasonable and achievable. LADA had the resources and ability to provide this  
25 accommodation promptly, yet chose to delay the process without justification.

26 95. Throughout the accommodation process, LADA failed to keep Chahoian adequately  
27 informed about the status of her request. This lack of communication added to her anxiety and  
28 uncertainty, further exacerbating her emotional distress and health issues.



1 December 18, 2023, Chahoian was forced to commute to the Antelope Valley Office in violation of her  
2 doctor's orders.

3 104. LADA's near month of inaction—despite already having sufficient information to make  
4 a timely accommodation—underscores LADA's lack of good faith in engaging with the interactive  
5 process.

6 105. As a result of LADA's delay in engaging in the interactive process and providing the  
7 necessary accommodation, the Plaintiff's health deteriorated further. She experienced increased anxiety,  
8 chronic fatigue, and worsening of her medical condition due to the prolonged commuting, which was in  
9 direct contradiction to her doctor's orders.

10 106. LADA's failure to engage in a timely and good-faith interactive process—despite clear  
11 evidence of Chahoian's medical needs—was a substantial factor in causing her ongoing harm, including  
12 exacerbation of her health issues and emotional distress.

13 **PRAYER FOR RELIEF**

14 WHEREFORE, Plaintiff Tatiana Chahoian prays for judgment against Defendants as follows:

- 15 1. For temporary, preliminary, and permanent injunctive relief against Defendants  
16 requiring them to cease and desist their harassment and retaliation against  
17 Chahoian in response to her whistleblowing activities;
- 18 2. For general damages, according to proof;
- 19 3. For special damages, according to proof;
- 20 4. For punitive damages against Defendant Gascón, in an amount to be determined  
21 by the Court according to proof;
- 22 5. For an award of attorneys' fees and costs incurred herein;
- 23 6. For an award of post-judgment interest for the maximum amount allowed by law;  
24 and
- 25 7. For any and all other relief the Court deems just and proper.  
26  
27  
28



1 Dated: October 30, 2024

Respectfully submitted,

2 **DHILLON LAW GROUP INC.**

3 By: John-Paul S Deol

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20 *Attorneys for Plaintiff*  
21 *Tatiana Chahoian*

1 **REQUEST FOR JURY TRIAL**

2 Plaintiff Chahoian hereby demands a trial by jury on all claims and issues so triable.

3  
4 Dated: October 30, 2024

Respectfully submitted,

5 **DHILLON LAW GROUP INC.**

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