

Assigned for all purposes to: Stanley Mosk Courthouse, Judicial Officer: Gregory Keosian

1 JACKIE LACEY
2 Los Angeles County District Attorney
3 STANLEY P. WILLIAMS SBN 106658
4 Head Deputy
5 HOON CHUN SBN 132516
6 Assistant Head Deputy
7 JESSIE LEE ANN MCGRATH SBN 131702
8 Deputy District Attorney
9 211 W. Temple Street, 10th Floor
10 Los Angeles, CA 90012
11 Telephone: (213) 257-2450
12 E-mail: hchun@da.lacounty.gov

*Exempt from filing fee pursuant
to Government Code § 6103*

9 SUMMER STEPHAN
10 District Attorney of San Diego County
11 THOMAS A. PAPAGEORGE SBN 77690
12 Head Deputy District Attorney
13 330 W. Broadway, Suite 750
14 San Diego, California 92101
15 Telephone: (619) 531-3971
16 E-mail: thomas.papageorge@sdcca.org

[Additional Attorneys for Plaintiff Listed on Addendum]

Attorneys for Plaintiff the PEOPLE of the State of California

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

19 THE PEOPLE OF THE STATE OF CALIFORNIA,
20
21 Plaintiff,

vs.

22 TIME WARNER CABLE, LLC, a Delaware Limited
23 Liability Company

24 Defendant.
25

Case No.

**COMPLAINT FOR INJUNCTION,
CIVIL PENALTIES, AND OTHER
EQUITABLE RELIEF**

1 many of its California customers, including many in the Counties of Los Angeles, San Diego and
2 Riverside.

3 5. The unlawful conduct, acts, and omissions of Defendant in violation of section 17500 of
4 the Business and Professions Code, as set forth herein, demonstrate the necessity and legal basis for
5 granting injunctive relief, disgorgement and restitution to victims and imposing civil penalties pursuant
6 to sections 17535 and 17536 of the Business and Professions Code.
7

8 **SECOND CAUSE OF ACTION**

9 **(Unfair Competition — Business and Professions Code Section 17200)**

10 6. Plaintiff realleges and incorporates herein by this reference paragraphs 1 through 5,
11 inclusive, as though set forth in full here. The acts and omissions alleged in this cause of action were
12 committed within four (4) years of the date of commencement of this action or were covered by a tolling
13 agreement between the parties.
14

15 7. Defendant engaged in unlawful businesses acts constituting unfair competition within the
16 meaning of section 17200 of the Business and Professions Code, as more fully alleged in paragraph 4,
17 above.
18

19 **PRAYER FOR RELIEF**

20 WHEREFORE, Plaintiff prays for judgment as follows:
21

22 1. That, pursuant to Business and Professions Code sections 17203 and 17535, Defendant,
23 and their respective officers, employees, agents, representatives, successors and assigns, and all persons
24 acting in concert or participation with any of them with actual or constructive knowledge of the terms of
25 this judgment, be permanently restrained and enjoined from engaging in the unlawful business practices
26 violating Business and Professions Code sections 17200 and 17500 described in paragraph 4 of this
27 Complaint.
28

ADDENDUM

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Additional Attorneys for Plaintiff:
MICHAEL A. HESTRIN
District Attorney of Riverside County
EVAN GOLDSMITH SBN 297356
Deputy District Attorney
3960 Orange Street
Riverside, California 92501
Telephone: (951) 955-5400
E-mail: EvanGoldsmith@RivCoDA.org