

SEP 09 2026

Attorney Names ROBERT ROBINSON EARL JR
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City, ST ZIP Code PALMDALE CA 93552
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Email 661 581 2219

COURT NAME

JURISDICTION

PLAINTIFF'S NAME ROBERT ROBINSON
EARL JR
Plaintiff,

Case No.: Number

vs.

PLEADING TITLE

DEFENDANT'S NAME, SODEXO LIVING AND
AFFILIATED COMPANIES - SDH SERVICES WEST
LLC.

WRONGFULL TERMINATION

OVER \$35,000

Attorney Name

(FOR DEFFIMATION AGAINST ALL DEFENDENTS)
PLAINTIFF INCORPORATES BY REFERENCE ALL
PRECEDING PARAGRAPHS OF THIS COMPLAINT
AS THOUGH FULLY SET FORTH HEREIN.

DEFENDTS, AND EACH OF THEM, PUBLISHED
FALSE, UNPRIVILEGED, AND UNVERIFIED STATEMENTS
CONCERNING PLAINTIFF BY BROADCASTING
DEFAMATORY ASSERTIONS AND DEROGATORY
ACCUSATIONS OVER GROUP TEXT MESSAGING
APPLICATIONS VIEWABLE BY COWORKERS AND PEERS
WITHIN THE WORKPLACE ENVIRONMENT.

THESE STATEMENTS FALSELY IMPLIED AND
ASSERTED THAT PLAINTIFF HAD ENGAGED IN
PLEADING TITLE - I

(1)

S-M-R

1 Attorney Names
2 Attorneys' Business Address
3 City, ST ZIP Code
4 Phone | Fax
5 Email

COURT NAME

JURISDICTION

6 PLAINTIFF'S NAME,

Case No.: Number

7 Plaintiff,

PLEADING TITLE

8 vs.

9 DEFENDANT'S NAME,

10

11

12

13

Attorney Name

14 PROFESSIONAL MISCONDUCT AND WRONGDOING, WHEN
15 IN TRUTH AND IN FACT, PLAINTIFF WAS ENTIRELY
16 INNOCENT OF ANY SUCH BEHAVIOR.

17 DEFENDENTS KNEW, OR IN THE EXERCISE OF
18 REASONABLE CARE SHOULD HAVE KNOWN, THAT
19 THESE STATEMENTS WERE FALSE. ALTERNATIVELY,
20 DEFENDENTS ACTED WITH RECKLESS DISREGARD FOR
21 THE TRUTH BY PUBLISHING THESE ACCUSATIONS
22 WITHOUT CONDUCTING A PROPER INVESTIGATION
23 OR ALLOWING THE PROMISE FIVE-DAY HR REVIEW
24 TO TAKE PLACE.

25 AS A DIRECT AND PROXIMATE RESULT OF
26 DEFENDANTS PUBLICATION OF THESE FALSE
27 STATEMENTS, PLAINTIFFS PROFESSIONAL
28 REPUTATION, STANDING, AND CHARACTER

PLEADING TITLE - I

1 Attorney Names
Attorneys' Business Address
2 City, ST ZIP Code
Phone | Fax
3 Email

COURT NAME

JURISDICTION

6 PLAINTIFF'S NAME,

7 Plaintiff,

8 vs.

9 DEFENDANT'S NAME,

Case No.: Number

PLEADING TITLE

Attorney Name

14 WITHIN THE WORKPLACE WERE SEVERLY
15 DAMAGED, RESULTING IN HUMILIATION, MENTAL
16 ANGUISH, AND EMOTIONAL ~~DISTRESS~~ STRESS.

18 (FOR INTENTIONAL INFLECTION OF EMOTION DISTRESS
19 AGAINST ALL DEFENDANTS)

21 PLAINTIFF INCORPORATES BY REFERENCE ALL
22 PRECEDING PARAGRAPHS OF THIS COMPLAINT
23 AS THOUGH FULLY SET FORTH HEREIN.

24 THE CONDUCT OF DEFENDENTS, AND EACH OF THEM,
25 AS DESCRIBED HEREIN - INCLUDING SUSPENDING
26 PLAINTIFF UNDER THE GUISE OF A PENDING
27 FIVE-DAY INVESTIGATION, CUTTING SHORT THAT
28 REVIEW PREMATURELY TO PERMANENTLY TERMINATE
PLEADING TITLE - 1

1 Attorney Names
2 Attorneys' Business Address
3 City, ST ZIP Code
4 Phone | Fax
5 Email

COURT NAME

JURISDICTION

6 PLAINTIFF'S NAME,

7 Plaintiff,

8 vs.

9 DEFENDANT'S NAME,

Case No.: Number

PLEADING TITLE

13 Attorney Name

14 PLAINTIFF, COORDINATING A CAMPAIGN
15 OF PUBLIC SHAMING OVER GROUP TEXTS, AND
16 SUBSEQUENTLY SOLICITING PERSONAL FINANCIAL
17 ASSISTANCE - WAS EXTREM AND OUTRAGEOUS.
18

19 DEFENDANTS ENGAGED IN THIS CONDUCT
20 WITH THE INTENTION OF CAUSING, OR WITH
21 RECKLESS DISREGARD OF THE PROBABILITY
22 OF CAUSING, SEVERE EMOTIONAL DISTRESS TO
23 THE PLAINTIFF.

24 AS A DIRECT AND PROXIMATE RESULT
25 OF DEFENDANTS' EXTREM AND OUTRAGEOUS
26 CONDUCT, PLAINTIFF HAS SUFFERED AND
27 CONTINUES TO SUFFER FROM SEVER EMOTIONAL
28 DISTRESS, SEVERE ANXIETY, HUMILIATION,
MENTAL ANGUISH AND PSYCHOLOGICAL TRAUMA.

PLEADING TITLE - 1

1 Attorney Names
2 Attorneys' Business Address
3 City, ST ZIP Code
4 Phone | Fax
5 Email

6 COURT NAME

7 JURISDICTION

8 PLAINTIFF'S NAME,

Case No.: Number

9 Plaintiff,

10 vs.

PLEADING TITLE

11 DEFENDANT'S NAME,

12
13 Attorney Name

14 (FOR WRONGFUL TERMINATION AND BAD FAITH
15 HANDLING AGAINST ALL DEFENDANTS)

16 PLAINTIFF INCORPORATES BY REFERENCE ALL
17 PRECEDING PARAGRAPHS OF THIS COMPLAINT
18 AS THOUGH FULLY SET FORTH HEREIN.

19 DEFENDANT SUBJECTED PLAINTIFF TO
20 ADVERSE EMPLOYMENT ACTION, SUDDEN SUSPENSION,
21 AND PREMATURE TERMINATION OF EMPLOYMENT
22 WITHOUT ADHERING TO THEIR OWN STANDARD
23 5 DAY REVIEW AND INVESTIGATION PROCEDURES,
24 AND WHILE DOING SO IN BAD FAITH.

25 THE TERMINATION OF PLAINTIFFS
26 EMPLOYMENT, EXCLUDED PRIOR TO THE
27 CONCLUSION OF THE PROMISED INVESTIGATION
28 AND IMMEDIATELY FOLLOWING MALICIOUS

PLEADING TITLE - 1

1 Attorney Names
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4 COURT NAME

5 JURISDICTION

6 PLAINTIFF'S NAME,

7 Plaintiff,

8 vs.

9 DEFENDANT'S NAME,

Case No.: Number

PLEADING TITLE

13 Attorney Name

14 PUBLIC SHAMING AND RETALIATORY
15 DYNAMICS, CONSTITUTED A BREACH OF THE
16 IMPLIED COVENANT OF GOOD FAITH AND
17 FAIR DEALING INHERENT IN THE
18 EMPLOYMENT RELATIONSHIP.

19 AS A DIRECT AND PROXIMATE RESULT
20 OF DEFENDANTS WRONGFULL TERMINATION
21 AND BAD FAITH ACTIONS, PLAINTIFF
22 HAS SUFFERED LOSS OF EARNINGS,
23 ECONOMIC DAMAGES, AND SEVERE PROFESSIONAL
24 DISRUPTION.

25 (PRAYER FOR RELIEF)

26 WHEREFORE, PLAINTIFF PRAYS FOR JUDGMENT
27 AGAINST DEFENDANTS, AND EACH OF THEM AS
28 FOLLOWS.

PLEADING TITLE - 1

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COURT NAME

JURISDICTION

6 PLAINTIFF'S NAME,

7 Plaintiff,

8 vs.

9 DEFENDANT'S NAME,

Case No.: Number

PLEADING TITLE

13 Attorney Name

14 FOR GENERAL DAMAGES, EMOTIONAL DISTRESS
15 DAMAGES, AND COMPENSATORY DAMAGES FOR
16 SEVERE MENTAL ANGUISH AND PROFESSIONAL
17 DISRUPTION, IN AN AMOUNT ACCORDING TO
18 PROOF AT TRIAL;

19 FOR SPECIAL DAMAGES, INCLUDING ANY
20 UNPAID WAGES, MISSED COMPENSATION, OR
21 FINANCIAL LOSSES RESULTING FROM THE
22 PREMATURE TERMINATION, IN AN AMOUNT
23 ~~ACCORDING~~ PROOF;

24 FOR PUNITIVE AND EXEMPLARY DAMAGES
25 AGAINST DEFENDANTS BASED ON THEIR
26 MALICIOUS, OPPRESSIVE, AND BAD FAITH
27 CONDUCT, IN AN AMOUNT APPROPRIATE TO
28 PUNISH AND DETER SUCH WRONGFUL BEHAVIOR

PLEADING TITLE - 1

1 Attorney Names
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4 Phone | Fax
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COURT NAME

JURISDICTION

6 PLAINTIFF'S NAME,

7 Plaintiff,

8 vs.

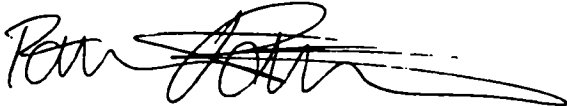
9 DEFENDANT'S NAME,

Case No.: Number

PLEADING TITLE

13 Attorney Name

14 FOR AN ORDER OF PERMANENT INJUNCTION
15 PROHIBITING DEFENDANTS FROM CONTINUING
16 TO PUBLISH, BROADCAST, OR SPREAD FALSE
17 AND DEFAMATORY STATEMENTS CONCERNING
18 PLAINTIFF;
19 FOR COST OF SUIT INCURRED HEREIN; AND
20 FOR SUCH OTHER AND FURTHER RELIEF
21 AS THE COURT MAY **DEEM** JUST AND PROPER
22
23
24

25 SEP. 9-2026 
26 BY. ROBERT ROBINSON, EARL JR.
27

28 PLEADING TITLE - 1

PLAINTIFF IN PROPER

(8)

SHORT TITLE	CASE NUMBER
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Step 4: Statement of Reason and Address: Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected. Enter the address, which is the basis for the filing location including zip code. (No address required for class action cases.)

REASON: ☐ 1. ☐ 2. ☐ 3. ☐ 4. ☐ 5. ☐ 6. ☐ 7. ☐ 8. ☐ 9. ☐ 10. ☐ 11			ADDRESS: RONALD REGAN PRESIDENTIAL LIBRARY 40 PRESIDENTIAL DRIVE, SIMI VALLEY, CA 93065
CITY: SIMI VALLEY	STATE: CA	ZIP CODE: 93065	

Step 5: Certification of Assignment: I certify that this case is properly filed in the VENTURA COUNTY District of the Superior Court of California, County of Los Angeles [Code of Civ. Proc., 392 et seq., and SCLAC Local Rule 2.3(a)(1)(E)]

Dated: 9-9-2026


 (SIGNATURE OF ATTORNEY/FILING PARTY)

PLEASE HAVE THE FOLLOWING ITEMS COMPLETED AND READY TO BE FILED IN ORDER TO PROPERLY COMMENCE YOUR NEW COURT CASE:

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet Judicial Council form CM-010.
4. Civil Case Cover Sheet Addendum and Statement of Location form SCLAC CIV 109 (01/23).
5. Payment in full of the filing fee, unless there is a court order for waiver, partial or schedule payments.
6. A signed order appointing a Guardian ad Litem, Judicial Council form CIV-010, if the plaintiff or petitioner is a minor under 18 years of age will be required by Court to issue a Summons.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the Summons and Complaint, or other initiating pleading in the case.