

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CIVIL DIVISION**

<p>FOOD ANIMAL CONCERNS TRUST, a nonprofit corporation, 3525 West Peterson Ave., Chicago, IL 60659,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>THE WENDY’S COMPANY, 1 Dave Thomas Blvd., Dublin, OH 43017; WENDY’S RESTAURANTS, LLC, 1 Dave Thomas Blvd., Dublin, OH 43017; WENDY’S GLOBAL, INC., 1 Dave Thomas Blvd., Dublin, OH 43017; and WENDY’S INTERNATIONAL, LLC, 1 Dave Thomas Blvd., Dublin, OH 43017,</p> <p style="text-align: center;">Defendants.</p>	<p>Case No. _____</p> <p>COMPLAINT</p> <p><u>DEMAND FOR JURY TRIAL</u></p>
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Plaintiff Food Animal Concerns Trust (“FACT”) brings this action against Defendants The Wendy’s Company; Wendy’s Restaurants, LLC; Wendy’s Global, Inc.; and Wendy’s International, LLC (collectively, “Wendy’s”) and alleges the following based upon personal knowledge, information, and belief. This Complaint is on behalf of the general public of the District of Columbia, in the interest of consumers.

INTRODUCTION

1. This is a consumer protection case concerning deceptive marketing representations about Wendy’s egg products. The case is brought by Food Animal Concerns Trust (“FACT”), a nonprofit, public interest organization dedicated to consumer protection. FACT seeks no monetary damages, only an end to the deceptive marketing and advertising at issue. FACT brings the case on behalf of the general public of the District of Columbia.

2. Wendy's is one of the world's largest fast-food chains. As of 2018, Wendy's had more than 6,700 locations worldwide, with the majority of its restaurants concentrated in North America.

3. Wendy's marketing and advertising materials represent to consumers that Wendy's menu items are produced in accordance with high animal welfare standards (the "Animal Welfare Representations"). For example, Wendy's Animal Welfare Representations include claims such as "industry-leading animal welfare program," "an environment where animals are comfortable," and "ensuring the humane treatment of animals."

4. Contrary to Wendy's Animal Welfare Representations, Wendy's produces and sells egg products (the "Products"¹) that are sourced from facilities where hens are confined in cages. Among animal welfare standards for egg-laying hens, cages are ranked as the lowest and most inhumane.

5. Thus, Wendy's marketing—which suggests that the Products are sourced in accordance with high animal welfare standards—is false and misleading to D.C. consumers.

STATUTORY FRAMEWORK

6. This action is brought under the District of Columbia Consumer Protection Procedures Act ("CPPA"), D.C. Code § 28-3901, *et seq.*

7. The CPPA makes it a violation for "any person" to, *inter alia*:

Represent that goods or services have a source, sponsorship, approval, certification, accessories, characteristics, ingredients, uses, benefits, or quantities that they do not have;

Represent that goods or services are of a particular standard, quality, grade, style, or model, if in fact they are of another;

Misrepresent as to a material fact which has a tendency to mislead;

¹ The "Products" include all of Wendy's restaurant and menu items that contain egg ingredients sourced from facilities that use cages.

Fail to state a material fact if such failure tends to mislead;

Use innuendo or ambiguity as to a material fact, which has a tendency to mislead;
or

Advertise or offer goods or services without the intent to sell them or without the
intent to sell them as advertised or offered.

D.C. Code § 28-3904(a), (d), (e), (f), (f-1), (h).

8. A violation of the CPPA may occur regardless of “whether or not any consumer is in fact misled, deceived, or damaged thereby.” *Id.* § 28-3904.

9. The CPPA “establishes an enforceable right to truthful information from merchants about consumer goods and services that are or would be purchased, leased, or received in the District of Columbia.” *Id.* § 28-3901(c). The statute “shall be construed and applied liberally to promote its purpose.” *Id.*

10. Because FACT is a public interest organization, it may act on behalf of the general public and bring any action that an individual consumer would be entitled to bring:

[A] public interest organization may, on behalf of the interests of a consumer or a class of consumers, bring an action seeking relief from the use by any person of a trade practice in violation of a law of the District if the consumer or class could bring an action under subparagraph (A) of this paragraph for relief from such use by such person of such trade practice.

Id. § 28-3905(k)(1)(D)(i). Subparagraph (A) provides: “A consumer may bring an action seeking relief from the use of a trade practice in violation of a law of the District.”

11. A public interest organization may act on behalf of consumers, *i.e.*, the general public of the District of Columbia, so long as the organization has “sufficient nexus to the interests involved of the consumer or class to adequately represent those interests.” *Id.* § 28-3905(k)(1)(D)(ii). As set forth in this Complaint, *see infra* ¶¶ 50-52, Plaintiff FACT’s mission is

to advocate for and educate consumers, including consumers within the District of Columbia. FACT thus has a sufficient nexus to D.C. consumers to adequately represent their interests.

12. This is not a class action, or an action brought on behalf of a specific consumer or consumers, but an action brought by FACT on behalf of the general public, *i.e.*, D.C. consumers generally. No class certification will be requested.

13. This action does not seek damages. Instead, FACT seeks to end the unlawful conduct directed at D.C. consumers. Remedies available under the CPPA include “[a]n injunction against the use of the unlawful trade practice” and “[a]ny other relief which the court determines proper.” *Id.* § 28- 3905(k)(2)(D), (F).

FACT ALLEGATIONS

I. Wendy’s Animal Welfare Representations Suggest to Consumers That the Products Are Produced in Accordance With High Animal Welfare Standards.

14. Wendy’s markets and sells the Products in the District of Columbia. It seeks to reach the District consumer base online through its company website, corporate social responsibility reports, and blog.

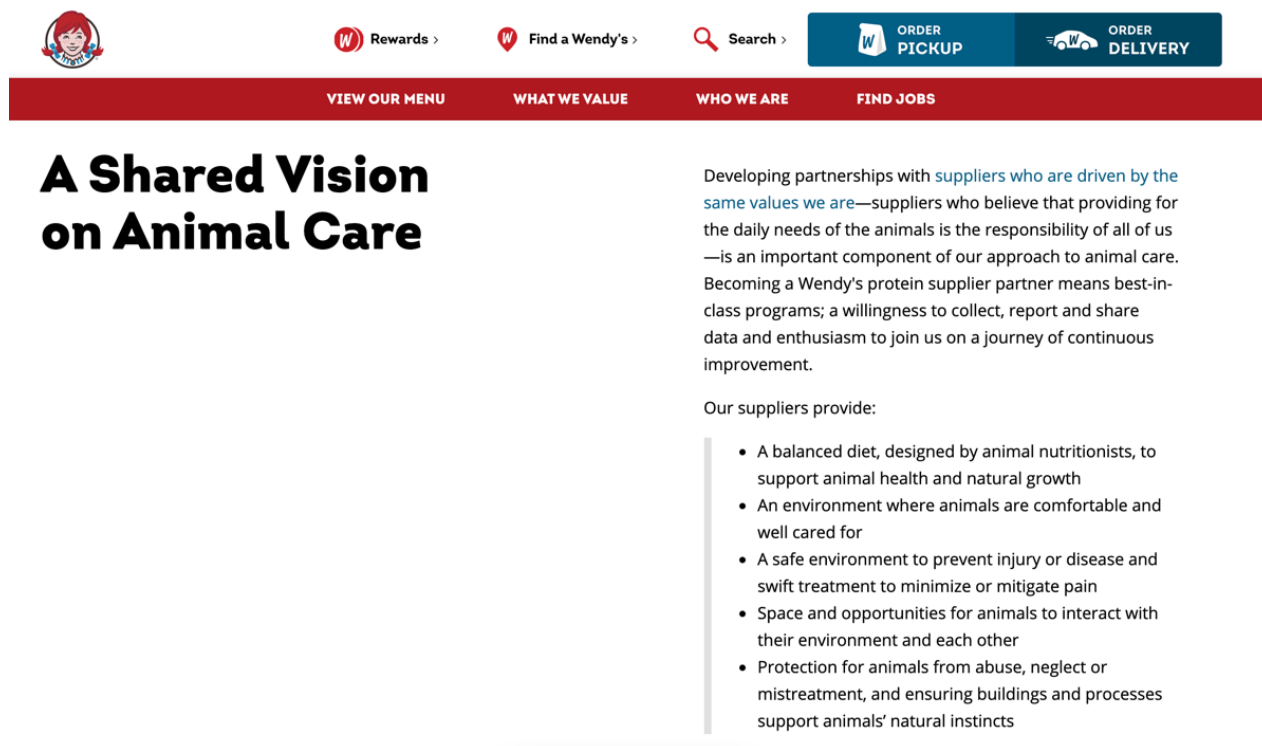
15. Through the Products’ online marketing, Wendy’s makes numerous Animal Welfare Representations.

16. Wendy’s “Animal Welfare” webpage² contains the following representations:

- “An environment where animals are comfortable and well cared for”;
- “A safe environment to prevent injury or disease and swift treatment to minimize or mitigate pain”;
- “Space and opportunities for animals to interact with their environment and each other”;

² *Animal Welfare*, Wendy’s, <https://www.wendys.com/csr-what-we-value/food/responsible-sourcing/animal-welfare> (last visited Sept. 7, 2021).

- “Protection for animals from abuse, neglect or mistreatment, and ensuring buildings and processes support animals’ natural instincts”; and
- “Our industry-leading animal welfare program ensures the welfare of the animals we rely on to provide our food.”



17. On that “Animal Welfare” webpage, Wendy’s specifically states that those standards, and all its animal welfare standards, apply to hens who produce eggs used in Wendy’s Products: “The same attention to animal care, quality and food safety applies to our sourcing of eggs and dairy.”

18. Wendy’s “Animal Care Standards Program” webpage³ and “The Wendy’s Animal Care Standards Program Assessment” document,⁴ which can be accessed from this webpage, contain the following representations:

³ *Animal Care Standards Program*, Wendy’s, <https://www.wendys.com/csr-what-we-value/food/responsible-sourcing/animal-welfare/animal-care-standards-program> (last visited Sept. 7, 2021).

⁴ *The Wendy’s Animal Care Standards Program Assessment*, Wendy’s, <https://www.wendys.com/sites/default/files/2021-04/Wendys-AnimalCareStandards.pdf>.

- “Ensuring the humane treatment of animals”; and
- “Operating with care by providing a comfortable environment for animals and allowing them to exhibit their natural behaviors.”

19. Wendy’s Animal Welfare Representations convey to consumers that its Products are sourced in accordance with high animal welfare standards.

II. Contrary to Wendy’s Animal Welfare Representations, Its Eggs Are Sourced From Facilities That Do Not Adhere to High Animal Welfare Standards.

20. Wendy’s Animal Welfare Representations suggest to consumers that the Products are sourced in accordance with high animal welfare standards, but in reality, Wendy’s egg suppliers do not adhere to high animal welfare standards.

21. As of 2020, only 5% of Wendy’s U.S. egg supply is even cage-free.⁵ The remaining 95% of Wendy’s U.S. egg supply is sourced from facilities that confine hens in cages.

22. Even among factory farm standards, confining hens in cages is considered one of the worst practices in terms of animal welfare.⁶

23. Battery cages are generally made of wire on all sides, including the bottom. Battery cages usually contain between four and ten birds. In these cages, each bird is afforded less than 90 square inches to move—a space smaller than the size of a sheet of paper.⁷ Hens are forced to live in these cramped conditions for their entire lives. At industrial egg farms, battery cages are piled on top of one another.⁸ Images of battery cage facilities are provided below⁹:

⁵ *Wendy’s Animal Welfare Program*, Wendy’s, <https://www.wendys.com/index.php/node/346> (last visited Sept. 7, 2021). This information regarding Wendy’s use of eggs from facilities that use cages is not found on any of the webpages at issue in the complaint. *See* Section I *supra*, notes 2-4.

⁶ *See, e.g.,* Kenny Torrella, *The biggest animal welfare success of the past 6 years, in one chart*, Vox (Mar. 23, 2021, 11:41 AM), <https://www.vox.com/future-perfect/22331708/eggs-cages-chickens-hens-meat-poultry>.

⁷ *Everything You Should Know About Battery Cages*, The Humane League (Dec. 3, 2020), <https://thehumaneleague.org/article/battery-cages>.

⁸ *Id.*

⁹ We Animals Media, <https://weanimalsmedia.org/> (last visited Sept. 7, 2021); Torrella, *supra* note 6.



24. Scientists and animal welfare experts have condemned the practice of confining egg-laying hens in cages due to the detrimental impacts on hen welfare.¹⁰

25. The use of battery cages has been banned or phased out by numerous U.S. states and countries. Within the United States alone, California, Colorado, Massachusetts, Michigan, Ohio, Oregon, Rhode Island, Utah, and Washington have passed legislation that either bans or requires the phasing-out of battery cages. Elsewhere, India, Bhutan, and the entire European Union have all banned or completely phased out battery cages, and New Zealand's phase-out will be completed in 2022.¹¹

26. Battery cage hens are among the most intensively confined animals in factory farms. Caged hens are unable to spread their wings or express most of their natural behaviors, such as wing-flapping, nesting, perching, and dustbathing, which are critical for hen welfare.¹²

27. Battery cages cause extreme psychological distress. For example, because hens confined in cages are unable to engage in natural nesting behavior, their nesting desires manifest instead as repetitive stress-induced behaviors, such as pecking at other chickens, restlessness, and “vacuum” nesting, where a hen mimes creating a nest.¹³

28. Battery cage hens suffer acute psychological distress when they want to lay an egg, because hens are unable to perform their natural behavior of retiring somewhere to lay eggs. Battery cage hens display agitated pacing and escape behaviors, which can last for 2-4 hours prior to egg-laying.¹⁴

¹⁰ E.g., *Scientists and Experts on Battery Cages and Laying Hen Welfare*, The Humane Society, <https://www.humanesociety.org/sites/default/files/docs/hsus-expert-synopsis-battery-cages-hen-welfare.pdf>.

¹¹ *Everything You Should Know About Battery Cages*, *supra* note 7.

¹² *Cage-free v. battery-cage eggs*, The Humane Society of the United States, <https://www.humanesociety.org/resources/cage-free-vs-battery-cage-eggs> (last visited July 20, 2021).

¹³ *Everything You Should Know About Battery Cages*, *supra* note 7.

¹⁴ *Scientists and Experts on Battery Cages and Laying Hen Welfare*, *supra* note 10.

29. In addition to psychological problems, battery cage hens also suffer physical trauma from extreme confinement in barren wire cages. The wire mesh floors cause painful open lesions and foot deformities.¹⁵ Battery hens get trapped in cages by the head and neck, body and wings, toes and claws, or other areas. Extreme confinement also exacerbates the development of osteoporosis, leading to bone fractures and chronic pain.¹⁶

30. Battery cage hens are selectively bred to produce unnaturally high volumes of eggs. This frequency leeches high levels of calcium from the hens' skeletal system to produce eggshells, which can lead to bone fragility, calcium depletion, and paralysis.¹⁷

31. Among animal welfare standards for egg-laying hens, battery cages are ranked as the lowest.¹⁸

32. Wendy's itself has recognized that eggs from caged hens are not sourced in accordance with high animal welfare standards.

33. In 2016, Wendy's announced that it would "transition to 100 percent cage-free eggs in our U.S. and Canadian restaurants by 2020."¹⁹ Liliana Esposito, Wendy's Chief Communications Officer, said: "We're proud of our commitment to move to 100 percent cage-free eggs for our breakfast items and will continue to incorporate evolving best practices in the areas of animal handling and welfare into our supply chain requirements." Wendy's thus

¹⁵ *Everything You Should Know About Battery Cages*, *supra* note 7.

¹⁶ *Scientists and Experts on Battery Cages and Laying Hen Welfare*, *supra* note 10.

¹⁷ *Everything You Should Know About Battery Cages*, *supra* note 7.

¹⁸ See, e.g., Dylan Matthews, *Cage-free, free range, organic: what all those egg labels really mean*, Vox (Oct. 19, 2018), <https://www.vox.com/2015/12/25/10662742/egg-labels-cage-free> (noting that an academic "mathematical model used to estimate the welfare of laying hens under various conditions" ranks typical cage systems as the lowest welfare form of egg production).

¹⁹ *The Wendy's Company Announces Timeline For Sourcing 100% Cage-Free Eggs*, The Wendy's Company (Jan. 4, 2016), <https://www.irwendys.com/news/news-details/2016/The-Wendys-Company-Announces-Timeline-For-Sourcing-100-Cage-Free-Eggs/default.aspx>.

acknowledged that transitioning to cage-free eggs was an improvement to the company's animal welfare standards.

34. Unfortunately, Wendy's did not live up to its commitment. Contrary to Wendy's promise to "transition to 100 percent cage-free eggs in our U.S. and Canadian restaurants by 2020," Wendy's now admits that only a small fraction of its eggs come from cage-free facilities.²⁰

35. Thus, Wendy's Animal Welfare Representations—which suggest to consumers that the Products are sourced in accordance with "industry-leading" and "humane" animal welfare standards—mislead D.C. consumers. Consumers are either misled into believing that Wendy's egg suppliers do not use cages, or consumers are misled into believing that Wendy's use of cage eggs is consistent with high animal welfare standards. Both are false.

III. Wendy's Animal Welfare Representations Are Material to D.C. Consumers.

36. American consumers increasingly seek out products with high animal welfare standards. As public awareness has grown regarding the inhumane treatment of animals in factory farms, public demand has also grown for humanely produced eggs.²¹ Consumers rely on representations like those made by Wendy's to identify animal products that are sourced and produced accordingly.

37. Consumer surveys demonstrate that Wendy's Animal Welfare Representations are material to consumers.

²⁰ *Wendy's Animal Welfare Program*, *supra* note 5. As set forth above, this information regarding Wendy's use of eggs from facilities that use cages is not found on any of the webpages at issue in the complaint.

²¹ *See, e.g., Torrella*, *supra* note 6.

38. For example, a 2015 Consumer Reports survey found that it is important to consumers that food not be produced using standard factory farm methods. 84% of consumers said it was “important” or “very important” to improve living conditions for animals.²²

39. American Humane, a certifier of egg products, confirms this trend with the following statement: “American Humane’s most recent survey shows overwhelming popular support for the humane treatment of farm animals. Its Humane Heartland Farm Animal Survey polled 5,900 Americans and more than nine in ten (94.9%) said they are ‘very concerned’ about farm animal welfare, up from 89 percent in American Humane’s 2013 study. More than three-quarters (75.7%) stated that they are very willing to pay more for humanely raised eggs, meat, and dairy products, up from 74 percent in 2013.”²³

40. A 2016 Consumer Reports survey found that a majority of consumers believed the following about animal products marketed as “humanely raised”:

- the animals were raised without cages (57%);
- the animals had adequate living space (77%); and
- the animals went outdoors (68%).²⁴

41. Consumers also care about animal welfare because foods produced in accordance with high animal welfare standards are better for humans.

42. For example, studies show that the nutritional value of eggs from pasture raised hens is higher than eggs from battery cage hens. Compared to eggs from stressfully confined hens,

²² See *Natural Food Labels Survey*, Consumer Reports National Research Center (2015), <https://foodpolitics.com/wp-content/uploads/Consumer-Reports-Natural-Food-Labels-Survey-Report.pdf>.

²³ *Handsome Brook Farm Achieves American Humane Certification For Pasture Raised Eggs*, American Humane (Mar. 31, 2016), <https://www.americanhumane.org/press-release/handsome-brook-farm-achieves-american-humane-association-certification-for-pasture-raised-eggs/>.

²⁴ *Food Labels Survey*, Consumer Reports National Research Center (Apr. 6, 2016), https://www.ftc.gov/system/files/documents/public_events/975753/cr_intro_and_2016_food_survey.pdf, at 2.

pasture raised eggs have less saturated fat and higher levels of vitamin D, vitamin E, and beta-carotene.²⁵ Studies also show that Salmonella rates are higher in cage facilities compared to other housing systems.²⁶

43. Wendy's knows that its Animal Welfare Representations are material to consumers, as evidenced by Wendy's focus on animal welfare marketing and its (unfulfilled) public commitment to transition to 100% cage-free eggs.

PARTIES

44. Defendant The Wendy's Company is an international fast food restaurant chain incorporated in Delaware with a corporate headquarters in Dublin, Ohio. The Wendy's Company is a holding company for the fast-food chain.²⁷

45. Defendant Wendy's Restaurants, LLC is a Delaware limited liability company with a principal place of business in Atlanta, Georgia. Wendy's Restaurants, LLC is a "100% owned subsidiary holding company" of The Wendy's Company.²⁸ Wendy's Restaurants, LLC is also the parent company of Wendy's International, LLC.²⁹

46. Defendant Wendy's Global, Inc. is a Delaware corporation with a principal place of business in Dublin, Ohio. Wendy's Global, Inc. is a subsidiary of Wendy's International, LLC.³⁰

²⁵ *The Nutritional Benefits of Pasture-Raised Laying Hens*, FACT (June 2021), <https://static1.squarespace.com/static/57d30c09893fc08d22e87aaf/t/60e4c60175d229760b742be6/1625605634862/FACT+handout+++Laying+Hens.pdf>.

²⁶ Gast et al., *Colonization of internal organs by Salmonella Enteritidis in experimentally infected laying hens of four commercial genetic lines in conventional cages and enriched colony housing*, 98 *Poultry Science* 1785, 1787 (2019).

²⁷ *The Wendy's Company*, LinkedIn, <https://www.linkedin.com/company/wendys-international/> (last visited Sept. 7, 2021).

²⁸ *2013 Annual Report*, The Wendy's Company (2013), https://www.annualreports.com/HostedData/AnnualReportArchive/w/NASDAQ_WEN_2013.pdf, at 2.

²⁹ *Id.*

³⁰ *Id.* at 143.

47. Defendant Wendy’s International, LLC is a Delaware corporation with a principal place of business in Dublin, Ohio. Wendy’s International, LLC is the “owner and franchisor of the Wendy’s restaurant system in the United States.”³¹

48. Collectively, the Defendants market, produce, and sell the Products.

49. The Products are available at Wendy’s restaurants, including restaurants in the District.

50. Plaintiff FACT is a 501(c)(3) nonprofit, public interest organization whose mission is to help consumers make informed food choices and to promote policies that make foods from animals safe and healthy to eat. FACT works to promote truth in advertising, corporate accountability, and environmental sustainability.

51. FACT performs its work throughout the United States, including in the District. For example, FACT has created a restaurant guide specifically for D.C. consumers seeking humane food options.³²

52. FACT represents and advances the rights and interests of consumers by educating consumers on food safety, industrial agriculture, corporate accountability, and environmental sustainability issues.

JURISDICTION

53. This Court has personal jurisdiction over the parties in this case. Plaintiff FACT consents to this Court having personal jurisdiction over the organization.

54. This Court has personal jurisdiction over Wendy’s because Wendy’s has purposefully directed its conduct to the District and has availed itself of the benefits and protections

³¹ *Id.* at 2.

³² *Dining Out Humanely: A Guide to Washington D.C. Restaurants for the Conscientious Consumer*, FACT, <https://static1.squarespace.com/static/57d30c09893fc08d22e87aaf/t/5b044f0bf950b75de2454bfb/1527009037182/Humane+Restaurants+DC+5.22.18.pdf> (last visited Sept. 7, 2021).

of District of Columbia law. Wendy's internet advertising is accessible in the District. Wendy's Products can be, and are, purchased in the District by District consumers at Wendy's D.C. locations.

55. This Court has subject-matter jurisdiction over this action under the CPPA, D.C. Code § 28-3901, *et seq.*

CAUSE OF ACTION

Violations of the District of Columbia Consumer Protection Procedures Act

56. FACT incorporates by reference all the allegations of the preceding paragraphs of this Complaint.

57. FACT is a nonprofit, public interest organization that brings these claims on behalf of the general public of D.C. consumers. *See* D.C. Code § 28-3905(k)(1)(D)(i).

58. Through § 28-3905(k)(1)(D)(i), the CPPA explicitly allows a public interest organization to represent consumers to seek relief from any violation of the CPPA.

59. Wendy's is a "person" and a merchant that provides "goods" within the meaning of the CPPA. *See id.* § 28-3901(a)(1), (3), (7).

60. As set forth above, Wendy's has advertised and marketed the Products with Animal Welfare Representations when, in fact, the Products are sourced from facilities that confine hens in cages. Thus, Wendy's has violated the CPPA by "represent[ing] that goods . . . have a source, . . . characteristics, . . . [or] benefits . . . that they do not have"; "represent[ing] that goods . . . are of a particular standard [or] quality . . . if in fact they are of another"; "misrepresent[ing] as to a material fact which has a tendency to mislead"; "fail[ing] to state a material fact if such failure tends to mislead"; "us[ing] innuendo or ambiguity as to a material fact, which has a tendency to

mislead”; and “advertis[ing] or offer[ing] goods . . . without the intent to sell them as advertised or offered.” *Id.* § 28-3904(a), (d), (e), (f), (f-1), (h).

JURY TRIAL DEMAND

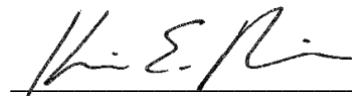
61. Plaintiff FACT hereby demands a trial by jury.

PRAYER FOR RELIEF

Wherefore, Plaintiff FACT prays for judgment against Defendant Wendy’s, and requests the following relief:

- a. A declaration that Wendy’s conduct is in violation of the CPPA;
- b. An order enjoining Wendy’s conduct found to be in violation of the CPPA; and
- c. An order granting Plaintiff FACT costs and disbursements, including reasonable attorneys’ fees and expert fees, and prejudgment interest at the maximum rate allowable by law.

RICHMAN LAW & POLICY



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Counsel for Plaintiff Food Animal Concerns Trust

Superior Court of the District of Columbia

CIVIL DIVISION- CIVIL ACTIONS BRANCH INFORMATION SHEET

FOOD ANIMAL CONCERNS TRUST

Case Number: _____

vs

Date: 9/9/2021

THE WENDY'S COMPANY, WENDY'S
RESTAURANTS, LLC, WENDY'S GLOBAL, INC.,
WENDY'S INTERNATIONAL, LLC

One of the defendants is being sued
in their official capacity.

Name: <i>(Please Print)</i> Kim E. Richman	Relationship to Lawsuit
Firm Name: Richman Law & Policy	<input checked="" type="checkbox"/> Attorney for Plaintiff
Telephone No.: (212) 687-8291	<input type="checkbox"/> Self (Pro Se)
Six digit Unified Bar No.: 1022978	<input type="checkbox"/> Other: _____

TYPE OF CASE: Non-Jury 6 Person Jury 12 Person Jury
Demand: \$ N/A Other: _____

PENDING CASE(S) RELATED TO THE ACTION BEING FILED

Case No.: _____ Judge: _____ Calendar #: _____

Case No.: _____ Judge: _____ Calendar#: _____

NATURE OF SUIT: *(Check One Box Only)*

A. CONTRACTS

COLLECTION CASES

- | | | |
|---|---|---|
| <input type="checkbox"/> 01 Breach of Contract | <input type="checkbox"/> 14 Under \$25,000 Pltf. Grants Consent | <input type="checkbox"/> 16 Under \$25,000 Consent Denied |
| <input type="checkbox"/> 02 Breach of Warranty | <input type="checkbox"/> 17 OVER \$25,000 Pltf. Grants Consent | <input type="checkbox"/> 18 OVER \$25,000 Consent Denied |
| <input type="checkbox"/> 06 Negotiable Instrument | <input type="checkbox"/> 27 Insurance/Subrogation | <input type="checkbox"/> 26 Insurance/Subrogation |
| <input type="checkbox"/> 07 Personal Property | Over \$25,000 Pltf. Grants Consent | Over \$25,000 Consent Denied |
| <input type="checkbox"/> 13 Employment Discrimination | <input type="checkbox"/> 07 Insurance/Subrogation | <input type="checkbox"/> 34 Insurance/Subrogation |
| <input type="checkbox"/> 15 Special Education Fees | Under \$25,000 Pltf. Grants Consent | Under \$25,000 Consent Denied |
| | <input type="checkbox"/> 28 Motion to Confirm Arbitration | |
| | Award (Collection Cases Only) | |

B. PROPERTY TORTS

- | | | |
|---|---|--------------------------------------|
| <input type="checkbox"/> 01 Automobile | <input type="checkbox"/> 03 Destruction of Private Property | <input type="checkbox"/> 05 Trespass |
| <input type="checkbox"/> 02 Conversion | <input type="checkbox"/> 04 Property Damage | |
| <input type="checkbox"/> 07 Shoplifting, D.C. Code § 27-102 (a) | | |

C. PERSONAL TORTS

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|---|--|--|
| <input type="checkbox"/> 01 Abuse of Process | <input type="checkbox"/> 10 Invasion of Privacy | <input type="checkbox"/> 17 Personal Injury- (Not Automobile, Not Malpractice) |
| <input type="checkbox"/> 02 Alienation of Affection | <input type="checkbox"/> 11 Libel and Slander | <input type="checkbox"/> 18 Wrongful Death (Not Malpractice) |
| <input type="checkbox"/> 03 Assault and Battery | <input type="checkbox"/> 12 Malicious Interference | <input type="checkbox"/> 19 Wrongful Eviction |
| <input type="checkbox"/> 04 Automobile- Personal Injury | <input type="checkbox"/> 13 Malicious Prosecution | <input type="checkbox"/> 20 Friendly Suit |
| <input checked="" type="checkbox"/> 05 Deceit (Misrepresentation) | <input type="checkbox"/> 14 Malpractice Legal | <input type="checkbox"/> 21 Asbestos |
| <input type="checkbox"/> 06 False Accusation | <input type="checkbox"/> 15 Malpractice Medical (Including Wrongful Death) | <input type="checkbox"/> 22 Toxic/Mass Torts |
| <input type="checkbox"/> 07 False Arrest | <input type="checkbox"/> 16 Negligence- (Not Automobile, Not Malpractice) | <input type="checkbox"/> 23 Tobacco |
| <input type="checkbox"/> 08 Fraud | | <input type="checkbox"/> 24 Lead Paint |

SEE REVERSE SIDE AND CHECK HERE IF USED

Information Sheet, Continued

C. OTHERS

- | | |
|---|---|
| <input type="checkbox"/> 01 Accounting | <input type="checkbox"/> 17 Merit Personnel Act (OEA) |
| <input type="checkbox"/> 02 Att. Before Judgment | (D.C. Code Title 1, Chapter 6) |
| <input type="checkbox"/> 05 Ejectment | <input type="checkbox"/> 18 Product Liability |
| <input type="checkbox"/> 09 Special Writ/Warrants
(DC Code § 11-941) | <input type="checkbox"/> 24 Application to Confirm, Modify,
Vacate Arbitration Award (DC Code § 16-4401) |
| <input type="checkbox"/> 10 Traffic Adjudication | <input type="checkbox"/> 29 Merit Personnel Act (OHR) |
| <input type="checkbox"/> 11 Writ of Replevin | <input type="checkbox"/> 31 Housing Code Regulations |
| <input type="checkbox"/> 12 Enforce Mechanics Lien | <input type="checkbox"/> 32 Qui Tam |
| <input type="checkbox"/> 16 Declaratory Judgment | <input type="checkbox"/> 33 Whistleblower |

II.

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|--|---|--|
| <input type="checkbox"/> 03 Change of Name | <input type="checkbox"/> 15 Libel of Information | <input type="checkbox"/> 21 Petition for Subpoena
[Rule 28-I (b)] |
| <input type="checkbox"/> 06 Foreign Judgment/Domestic | <input type="checkbox"/> 19 Enter Administrative Order as
Judgment [D.C. Code § | <input type="checkbox"/> 22 Release Mechanics Lien |
| <input type="checkbox"/> 08 Foreign Judgment/International | 2-1802.03 (h) or 32-151 9 (a)] | <input type="checkbox"/> 23 Rule 27(a)(1)
(Perpetuate Testimony) |
| <input type="checkbox"/> 13 Correction of Birth Certificate | <input type="checkbox"/> 20 Master Meter (D.C. Code § | <input type="checkbox"/> 24 Petition for Structured Settlement |
| <input type="checkbox"/> 14 Correction of Marriage
Certificate | 42-3301, et seq.) | <input type="checkbox"/> 25 Petition for Liquidation |
| <input type="checkbox"/> 26 Petition for Civil Asset Forfeiture (Vehicle) | | |
| <input type="checkbox"/> 27 Petition for Civil Asset Forfeiture (Currency) | | |
| <input type="checkbox"/> 28 Petition for Civil Asset Forfeiture (Other) | | |

D. REAL PROPERTY

- | | |
|--|--|
| <input type="checkbox"/> 09 Real Property-Real Estate | <input type="checkbox"/> 08 Quiet Title |
| <input type="checkbox"/> 12 Specific Performance | <input type="checkbox"/> 25 Liens: Tax / Water Consent Granted |
| <input type="checkbox"/> 04 Condemnation (Eminent Domain) | <input type="checkbox"/> 30 Liens: Tax / Water Consent Denied |
| <input type="checkbox"/> 10 Mortgage Foreclosure/Judicial Sale | <input type="checkbox"/> 31 Tax Lien Bid Off Certificate Consent Granted |
| <input type="checkbox"/> 11 Petition for Civil Asset Forfeiture (RP) | |



Attorney's Signature

9/9/2021

Date