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15 *Attorneys for Plaintiff B.R.  
and the Proposed Class*

16 **UNITED STATES DISTRICT COURT,  
17 CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA**

18 B.R., a minor, and all others similarly ) Case No.:  
19 situated, by and through his Guardian )  
20 ad litem, JILL RANDALL, ) **COMPLAINT FOR DAMAGES**  
21 ) **PURSUANT TO 42 U.S.C §1983**  
22 Plaintiff, )  
23 vs. ) **DEMAND FOR JURY TRIAL**  
24 )  
25 COUNTY OF ORANGE, a public ) **Class Action**  
26 entity; MYESHIA HAMMOND, in )  
27 her personal capacity, together with )  
28 all others similarly situated, )  
Defendants. )

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**JURISDICTION**

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- 11 1. Jurisdiction is conferred on this Court by 28 U.S.C. §§ 1343(a)(3) and  
12 1343(a)(4), which provide for original jurisdiction for all suits brought  
13 pursuant to 42 U.S.C. § 1983. Jurisdiction is also conferred by 28 U.S.C. §  
14 1331 because the claims for relief derive from the United States  
15 Constitution and the laws of the United States.

16

**VENUE**

- 17
- 18 2. Venue is proper in this district and in this division because all of the events  
19 giving rise to the claims occurred in this district and in this division, and  
20 the Defendants reside here.

21

**PLAINTIFF**

- 22
- 23 3. Plaintiff B.R. is an individual, who at all relevant times was a resident of  
24 Huntington Beach, California, and a minor in the sole physical and legal  
25 custody of his mother, non-party Jill Randall. He was born in December of  
26 2005.
- 27 4. Prior to the involvement of the Defendants, Ms. Randall provided for her  
28 son's needs at all times and was his primary caretaker. Plaintiff was raised,  
nurtured, guided by, and cared for by his mother and both mother and child  
enjoyed the company, companionship, and society of each other, and all  
other benefits and obligations attendant to their parent-child relationship.

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**Public Defendants**

5. Defendant County of Orange (“County”) is a municipality in corporate form, organized and existing under the laws of the State of California, and has as an administrative subunit thereof, the Department of Children & Family Services (“Agency”).

6. Agency is a governmental agency organized and existing pursuant to the laws and policies of Defendant County. Plaintiff alleges that Defendant County and its Agency encouraged and permitted its employees to regularly seize children from the homes and care of their parents without first obtaining a warrant or similar court order, under circumstances where no exigency existed, as described in greater detail herein.

**Individual Defendant**

7. Defendant Myeshia Hammond (“Hammond”), was at all relevant times mentioned herein employed by County as a Social Worker in the Agency. At all times relevant herein, she acted under color of law, within the course and scope of her employment, and in accordance with the customs, policies, procedures, and practices of the Agency and County.

**General Allegations**

8. On March 8, 2010, Hammond seized Plaintiff from his mother’s care and custody. At the time of the seizure, B.R. had not been injured or physically

1 abused in any way, and there were no allegations that B.R. had suffered  
2 any form of physical abuse – Hammond knew this. Moreover, when B.R.  
3 was seized, there was no reasonable or articulable evidence to suggest that  
4 he was likely to suffer severe bodily injury or death in the time it would  
5 have taken to obtain a warrant.  
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8 9. At the time of B.R.’s seizure, Hammond did not have a warrant and did not  
9 explore any lesser intrusive alternative means of ensuring Plaintiff’s safety  
10 before seizing him. At no time was there any immediate threat of death or  
11 serious bodily injury to Plaintiff. At the time of seizure, Hammond  
12 possessed *no* evidence to suggest that Plaintiff would suffer any serious  
13 bodily injury at the hands of his mother, Jill Randall. Plaintiff alleges that  
14 at the time of the seizure a warrant could have been obtained from a Judge  
15 of the Superior Court within two hours.  
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19 10. Plaintiff was returned to his mother’s care three days later on March 11,  
20 2010 by court order. No juvenile dependency petition was ever filed by the  
21 Agency, and no court ever found that warrantless seizure of Plaintiff from  
22 his mother’s care on March 8, 2010, was justified or appropriate.  
23  
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25 11. At the time Plaintiff was seized, neither the County or the Agency had any  
26 policy, guideline, rule, procedures, practice or custom that would require  
27 any of its social worker employees to first obtain judicial authorization  
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1 before seizing a child in the absence of an exigency involving death or  
2 serious bodily injury. On the contrary, at that time it was the standard  
3 operating procedure for Agency social workers to seize children from the  
4 parents without first obtaining a warrant regardless of whether or not  
5 exigent circumstances existed.  
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8 12. At the time Plaintiff was seized, it was clearly established that any  
9 governmental entity, including Defendant County and its Agency, were  
10 required by the Fourth and Fourteenth Amendments to the United States  
11 Constitution to first obtain judicial authorization before seizing a child in  
12 the absence of a exigency involving death or serious bodily injury. Indeed,  
13 more than a decade earlier in *Wallis v. Spencer*, 202 F.3d 1126, 1138 (9th  
14 Cir. 2000), the Ninth Circuit held that “Officials may remove a child from  
15 the custody of its parent without prior judicial authorization only if the  
16 information they possess at the time of the seizure is such as provides  
17 reasonable cause to believe that the child is in imminent danger of serious  
18 bodily injury and that the scope of the intrusion is reasonably necessary to  
19 avert that specific injury.”  
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22 13. The following year, the Ninth Circuit further emphasized these  
23 constitutional limits on social workers, holding that “Government officials  
24 are required to obtain prior judicial authorization before intruding on a  
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1 parent's custody of her child unless they possess information at the time of  
2 the seizure that establishes reasonable cause to believe that the child is in  
3 imminent danger of serious bodily injury and that the scope of the  
4 intrusion is reasonably necessary to avert that specific injury." *Mabe v. San*  
5 *Bernardino County*, 237 F.3d 1101, 1106 (9th Cir. Cal. 2001).  
6

7  
8 14. For years prior to seizing Plaintiff, Defendants knew or should have  
9 known that seizing a child from the custody of his mother was per se  
10 unconstitutional in the absence of a warrant or immediate threat of serious  
11 bodily injury. And even this limited exception to the warrant requirement  
12 must be "strictly circumscribed by the exigencies which justify its  
13 initiation." *Terry v. Ohio*, 392 U.S. 1, 25-26 (1968).  
14  
15

16  
17 15. Notwithstanding their knowledge of the constitution's requirements,  
18 neither County, or Agency, or any member of the Social Worker Class  
19 including Hammond made any attempt to obtain a warrant prior to seizing  
20 Plaintiff from his mother's custody. Defendants further made no attempt to  
21 establish or describe an exigency that would demand the immediate seizure  
22 of Plaintiff, a seizure that lasted for several days.  
23  
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25  
26 16. County and Agency only recently promulgated a policy to require a  
27 warrant to seize a child where no exigency existed, in March 2010. But,  
28 even with such a policy in place the County did not institute a mandatory

1 training program for its social workers on warrants until February 2012,  
2 long after Plaintiff's seizure. The County instituted its mandatory training  
3 program on warrants because of the rising burden associated with litigating  
4 warrantless removal claims.  
5

- 6 17. During the time period between May 2005 and May 2010, the Agency  
7 seized 7,840 children from their families. Each child in this time period  
8 was seized before the County trained any of its social workers about the  
9 serious constitutional limitations on their power – specifically warrant  
10 requirements. Defendants seized literally thousands of children from their  
11 parents and guardians without any warrant or exigency in the years before  
12 the County promulgated a warrant policy and trained on it. Each such  
13 seizure is a violation of the constitution that demands redress.  
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### 18 Tolling

- 19 18. **Age of Majority.** The statute of limitations has been tolled by the failure  
20 of class members, including Plaintiff, to reach the age of majority. The  
21 statute of limitations for the deprivation of constitutional rights does not  
22 even begin to run until the victim reaches the age of majority, which in  
23 California is eighteen years of age.  
24  
25 19. **Discovery Rule.** Plaintiff's claims accrued upon discovery that he was  
26 removed from his mother's care and custody without a warrant. Plaintiff is  
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1 typical of other members of the class of children similarly seized in that  
2 they did not discover and could not have discovered this fact through  
3 reasonable and diligent investigation until well after they were seized.  
4

5 20. **Active Concealment Tolling.** The statute of limitations has also been  
6 tolled by Defendant County's knowing and active concealment of the fact  
7 that only a credible threat of immediate death or serious bodily injury can  
8 support the seizure of a child from his parents' care and custody in the  
9 absence of a warrant. Hammond, together with other members of the  
10 Defendant Employee Class, kept Plaintiff and other class members  
11 ignorant of vital information essential to the pursuit of their claims,  
12 without any fault or lack of diligence on the part of Plaintiff or other class  
13 members. Plaintiff and class members could not reasonably have  
14 discovered the fact that they were removed from their parents' care and  
15 custody without a warrant.  
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21 **Plaintiff Class Action Allegations**

22 21. Plaintiff brings this action on behalf of himself and all other persons  
23 similarly situated, under Federal Rules of Civil Procedure 23(b)(2) and  
24 23(b)(3).  
25

26  
27 22. The class of persons that Plaintiff seeks to represent is defined as follows:

28 All natural persons who, as minors, were seized from the care and

1 custody of their parents by Orange County without prior judicial  
2 authorization and in the absence of an immediate threat of grievous  
3 bodily injury or death.  
4

- 5 23. Excluded from the Plaintiff Class are Defendants, as well as the  
6 employees, officers, executives, or directors of Defendant County or any of  
7 its subdivisions, along with the judicial officers assigned to this case, court  
8 employees, and the attorneys of record in this case. Plaintiff reserves the  
9 right to amend the Class definition if discovery and further investigation  
10 reveal that the Class should be expanded or otherwise modified.  
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14 **Numerosity and Impracticability of Joinder.**

- 15 24. The members of the class are so numerous that joinder of all members as  
16 individuals would be impracticable. Plaintiff is informed and believes, and  
17 on that basis alleges, that the number of Class members exceeds five  
18 thousand (5,000) persons. The precise numbers and identities of members  
19 of the Plaintiff Class can be ascertained through discovery, including  
20 records of the Superior Court of California, in and for the County of  
21 Orange, as well as the records of the Defendant Agency.  
22  
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24  
25 **Commonality and Predominance.**

- 26  
27 25. There are common questions of law and fact that predominate over any  
28 questions affecting only individual members of the Plaintiff Class. These

1 common legal and factual questions include but are not limited to the  
2 following:

- 3
- 4 a. Whether prior judicial authorization is required to seize a  
5 child from the care and custody of his or her parent(s) or  
6 guardian(s) in the absence of an exigency involving an  
7 immediate threat of serious bodily injury or death;
- 8
- 9 b. Whether members of the Defendant Social Worker Class  
10 knew they were required to first obtain judicial authorization  
11 to seize a child from the care and custody of his or her  
12 parent(s) or guardian(s) in the absence of an exigency  
13 involving an immediate threat of serious bodily injury or  
14 death;
- 15
- 16 c. Whether members of the Defendant Social Worker Class  
17 removed and seized minor children without first obtaining a  
18 warrant notwithstanding having actual knowledge that prior  
19 judicial authorization was required in the absence of an  
20 exigency involving an immediate threat of serious bodily  
21 injury or death;
- 22
- 23 d. Whether members of the Defendant Social Worker Class  
24 acted with conscious disregard for the constitutional rights of  
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1 children to be free from warrantless seizures;

2 e. Whether the Defendant County failed to enact a policy and  
3 procedure requiring its employees to seek and obtain judicial  
4 authorization prior to removing a child from the care and  
5 custody of his or her parent(s) or guardian(s) in the absence of  
6 an exigency involving an immediate threat of serious bodily  
7 injury or death;  
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11 f. Whether the Defendant County failed to instruct, counsel,  
12 train, supervise, and enforce a policy and procedure requiring  
13 its employees to seek and obtain judicial authorization prior to  
14 removing a child from the care and custody of his or her  
15 parent(s) or guardian(s) in the absence of an exigency  
16 involving an immediate threat of serious bodily injury or  
17 death;  
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21 g. Whether Plaintiff and the Class have suffered damages  
22 resulting from being removed from their parent(s) or  
23 guardian(s) without prior judicial authorization in the absence  
24 of an exigency involving an immediate threat of serious  
25 bodily injury or death; and  
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27  
28 h. Whether as a result of Defendants' collective and individual

1 misconduct, Plaintiff and the Class are entitled to equitable  
2 relief, and if so the nature of such relief.

3  
4 **Typicality**

5 26. Plaintiff's claims are typical of the claims of the members of the Class.  
6 Plaintiff and all class members have been injured by the same wrongful  
7 customs, practices, policies, and standard operating procedures of  
8 Defendant County and the members of the Defendant Social Worker Class.  
9 Plaintiff's claims arise from the same customs, practices, policies, and  
10 procedures (or lack thereof) that give rise to the claims of the Class  
11 members and are based on the same legal theories.

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14 **Adequacy**

15 27. Plaintiff, by and through his guardian ad litem, will assert and protect fully  
16 and adequately the interests of the Class. Plaintiff has retained class  
17 counsel who are experienced and qualified in prosecuting class actions,  
18 and civil rights action arising from alleged warrantless seizures of children  
19 by Orange County. Neither Plaintiff, his guardian ad litem, or his  
20 attorneys, have any interests contrary to or conflicting with the Class.

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24 **Superiority**

25 28. A class action is superior to all other available methods for the fair and  
26 efficient adjudication of this lawsuit, because individual litigation of the  
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1 claims of all Class members is economically unfeasible and procedurally  
2 impracticable. The likelihood of individual Class members prosecuting  
3 their own separate claims is remote, and even if every Class member could  
4 afford individual litigation, the court system would be unduly burdened by  
5 individual litigation of such cases. Further, individualized litigation would  
6 also result in varying, inconsistent, or contradictory judgments and would  
7 magnify the delay and expense to all of the parties and the court system  
8 because of multiple trials of the same factual and legal issues. Plaintiff  
9 knows of no difficulty to be encountered in the management of this action  
10 that would preclude its maintenance as a class action.

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15 29. In addition, Defendants have acted or refused to act on grounds generally  
16 applicable to the Class and, as such, final injunctive relief or  
17 corresponding declaratory relief with regard to the members of the Class as  
18 a whole is appropriate.

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21 30. Defendants have, or have access to, information for the Class members that  
22 may be used for the purpose of providing notice of the pendency of this  
23 action.

24  
25 **Defendant Class Action Allegations**

26  
27 31. The use of a representative action to litigate conclusively the interests and  
28 liabilities of a defendant class has long been accepted in the United States.

1 See *Smith v. Swormstedt*, 57 U.S. (16 How.) 288, 302 (“[T]he rule is well  
2 established that a . . . bill may . . . be maintained against a portion of a  
3 numerous body of defendants, representing a common interest.”)  
4

5 32. Defendant class actions are expressly authorized by Rule 23(a) of the  
6 Federal Rules of Civil Procedure, which provides in pertinent part that  
7 “[o]ne or more members of a class may sue or be sued as representative  
8 parties on behalf of all members” so long as certain criteria are met.  
9

10 33. Plaintiff and members of the Plaintiff Class assert common allegations of  
11 fact and law against a class of persons defined as follows:  
12

13 “All natural persons who were employed by the County of Orange  
14 as a social worker, investigator, supervisor, specialist, or similar  
15 function regardless of job title who participated in, supervised,  
16 agreed with, counseled, or advised other such employees in seizing  
17 any member of the Plaintiff Class from the custody of his or her  
18 parent or guardian.”  
19

20 34. This defendant class will be termed herein as the “Social Worker Class” or  
21 “Defendant Class” for the purposes of clarity and comprehension.  
22

23 35. Excluded from the Social Worker Class are Plaintiff, his  
24 guardian-ad-litem, and any member of the Plaintiff Class, along with the  
25 judicial officers assigned to this case, court employees, and the attorneys  
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1 of record in this case. Plaintiff reserves the right to amend the Class  
2 definition if discovery and further investigation reveal that the Class  
3 should be expanded or otherwise modified.  
4

### 5 **Numerosity and Impracticability of Joinder**

6 36. The members of the Social Worker Class are so numerous that joinder of  
7 all members as individuals would be impracticable. Plaintiff is informed  
8 and believes, based upon the experience and investigation of his counsel,  
9 and therefore alleges, that the number of members of the Social Worker  
10 Class exceeds three hundred (300) persons. The precise numbers and  
11 identities of members of the Defendant Social Worker Class can be  
12 ascertained through discovery, including records of the Superior Court of  
13 California, in and for the County of Orange, as well as the records of  
14 Defendant Agency.  
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### 19 **Commonality and Predominance**

20  
21 37. There are common questions of law and fact that predominate over any  
22 questions affecting only individual members of the Social Worker Class.  
23 These common legal and factual questions include but are not limited to  
24 the following:  
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- 26  
27 a. Whether members of the Social Worker Class knew they were  
28 required first to obtain judicial authorization to seize a child

1 from the care and custody of his or her parent(s) or  
2 guardian(s) in the absence of an exigency involving an  
3 immediate threat of serious bodily injury or death;

4  
5 b. Whether members of the Social Worker Class acted to  
6 effectuate warrantless removals and seizures of minor  
7 children notwithstanding their actual knowledge that prior  
8 judicial authorization was required in the absence of an  
9 exigency involving an immediate threat of serious bodily  
10 injury or death;

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13 c. Whether members of the Defendant Social Worker Class  
14 acted with negligent disregard for the constitutional rights of  
15 children to be free from warrantless removals;

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18 d. Whether members of the Defendant Social Worker Class  
19 counseled and encouraged each other to disregard  
20 constitutional strictures and create a culture of deliberate  
21 disregard for known legal obligations;

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24 e. Whether the Defendant County failed to enact a policy and  
25 procedure requiring members of the Defendant Social Worker  
26 Class to seek and obtain judicial authorization prior to  
27 removing a child from the care and custody of his or her  
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1 parent(s) or guardian(s) in the absence of an exigency  
2 involving an immediate threat of serious bodily injury or  
3 death; and  
4

- 5 f. Whether the Defendant County failed to instruct, counsel,  
6 train, supervise, and enforce a policy and procedure requiring  
7 members of the Social Worker Class to seek an obtain judicial  
8 authorization prior to removing a child from the care and  
9 custody of his or her parent(s) or guardian(s) in the absence of  
10 an exigency involving an immediate threat of serious bodily  
11 injury or death;  
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15 **Typicality**

- 16  
17 38. Hammond is typical of the members of the Defendant Class, having  
18 worked in the employ of Defendant County and Defendant Agency for  
19 several years. Hammond and members of the Social Worker Class  
20 participated in the same or similar training programs while working for the  
21 Agency which lacked any instruction on procedures or policies or  
22 standards regarding when a child may be lawfully removed from his or her  
23 parent's care without prior judicial authorization. Hammond and members  
24 of the Social Worker Class participated in or supervised, counseled,  
25 consulted, or advised on removals of children without prior judicial  
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1 authorization in the absence of an immediate threat of serious bodily  
2 injury. As such, Hammond's training, experience, actions, inactions, and  
3 work duties are typical and representative of other members of the  
4 Defendant Social Worker Class.  
5

6 **Adequacy**  
7

8 39. Hammond will fully and adequately assert and protect the interests of the  
9 Defendant Class and will likely retain counsel for her defense who is  
10 experienced and qualified in defending class actions, as well as litigating  
11 warrantless seizure procedures. Plaintiff knows of no interests of  
12 Hammond that are contrary to or conflicting with other members of the  
13 Defendant Social Worker Class. In the event Hammond is not an adequate  
14 representative, Plaintiff will seek to identify other individual members of  
15 the Defendant Class and name them as representative defendants in her  
16 stead.  
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21 **Superiority**  
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23 40. A defendant class action is superior to all other available methods for the  
24 fair and efficient adjudication of this lawsuit, because individual litigation  
25 of the claims of all Defendant Social Worker Class members is  
26 economically unfeasible and procedurally impracticable. The court system  
27 would be unduly burdened by individual litigation of such cases, creating  
28

1 as many independent class actions as there are former and present  
2 employees of the Agency. Further, individualized litigation would also  
3 result in varying, inconsistent, or contradictory judgments and would  
4 magnify the delay and expense to all of the parties and the court system  
5 because of multiple trials of the same factual and legal issues. Plaintiff  
6 knows of no difficulty to be encountered in the management of this action  
7 that would preclude its maintenance as a defendant class action. In  
8 addition, named Defendants and other members of the Defendant Social  
9 Worker Class have acted or refused to act on grounds generally applicable  
10 to the Plaintiff Class and, as such, final injunctive relief or corresponding  
11 declaratory relief with regard to the members of the Defendant Class as a  
12 whole is appropriate.  
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18 41. Defendants have, or have access to, information for the Defendant Class  
19 members which may be used for the purpose of providing notice of the  
20 pendency of this action.  
21

22 **First Claim for Relief**

23 **Violation of Civil Rights – 42 U.S.C. § 1983**

24 **(Against Hammond and Defendant Class – Seizure Without Warrant)**

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26  
27 42. Plaintiff re-alleges and incorporate paragraphs 1 through 41, inclusive, as  
28 though fully set forth herein.

1 43. Hammond was at all times acting under color of state law when she seized  
2 Plaintiff on March 8, 2010. Hammond failed to seek or obtain a warrant  
3 authorizing B.R.'s seizure. At the time of seizure, there was no evidence to  
4 suggest that Plaintiff would suffer any serious bodily injury or death in the  
5 time that it would take Hammond to obtain a removal warrant. In reality,  
6 there was no immediate danger to B.R. when Defendant seized him. As the  
7 direct and proximate result of Hammond's actions, Plaintiff has suffered,  
8 and will continue to suffer, physical, mental, and emotional injury, all to an  
9 extent and in an amount subject to proof at trial.  
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14 **Second Claim for Relief**

15 **Violation of Civil Rights – 42 U.S.C. § 1983**

16 ***Monell Claims Against County of Orange***

17  
18 44. Plaintiff B.R. re-alleges and incorporates paragraphs 1 through 41, and 43,  
19 inclusive, as though fully set forth herein.  
20

21 45. The practices, procedures, customs, usages of Defendant County of Orange  
22 were the moving force behind the violations of Plaintiff's constitutional  
23 rights, including those arising under the Fourth and Fourteenth  
24 Amendments. These customs, practices, and procedures include but are not  
25 limited to:  
26  
27

28 a. the practice of removing children from their family and their

1 homes without first obtaining a warrant or other court order  
2 when no exigency exists;

- 3  
4 b. acting with deliberate indifference in implementing a policy  
5 of inadequate training or by failing to train adequately, the  
6 County's officers, agents, and employees with respect to  
7 well-established constitutional protections, including those  
8 under the Fourth and Fourteenth Amendments;
- 9  
10 c. acting with deliberate indifference in implementing a policy  
11 of inadequate supervision or by failing to supervise  
12 adequately, the County's officers, agents, and employees with  
13 respect to well-established constitutional protections,  
14 including those under the Fourth and Fourteenth  
15 Amendments.  
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19 46. Defendant County breached its duties and obligations to Plaintiff by,  
20 including but not limited to, failing to establish, implement and follow the  
21 correct and proper constitutional policies; by failing adequately to select,  
22 supervise, train, control, and review its agents and employees as to their  
23 compliance with constitutional safeguards; and by knowingly, or with  
24 deliberate indifference, permitting the Individual Defendants and its  
25 Agency to engage in the unlawful and unconstitutional conduct as alleged  
26  
27  
28

1 above.

2 47. Defendant County knew, or should have known, that by breaching the  
3 above-mentioned duties and obligations that it was foreseeable that its  
4 agents would, and did, cause Plaintiff and Class Members to be injured by  
5 such breaches. Defendant County also knew that such breaches were in  
6 contravention of public policy and its legal duties and obligations to  
7 Plaintiff and Class Members.  
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10  
11 48. These actions and inactions of the County were the moving force behind  
12 the constitutional violations alleged above, and the direct and proximate  
13 cause of injuries to Plaintiff and members of the Plaintiff Class. As a result  
14 Plaintiff and members of the Plaintiff Class have sustained general and  
15 special damages to an extent and in an amount to be proven at trial.  
16  
17

18 **Prayer for Relief**

19 Plaintiff for himself and for all others similarly situated, prays for  
20 judgment against the County of Orange, Myeshia Hammond, and each member  
21 of the Social Worker Class for the following:  
22

23  
24 1. An order certifying the Plaintiff Class and the Defendant Social  
25 Worker Class under Federal Rule of Civil Procedure 23(b)(2) and 23(b)(3);  
26 appointing Plaintiff as a representative of the Class; appointing Defendant  
27 Myeshia Hammond as representative of the Social Worker Class; and appointing  
28

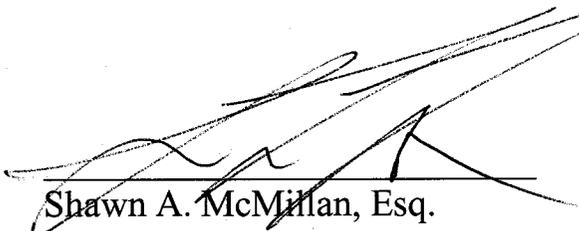


**DEMAND FOR JURY TRIAL**

Pursuant to Rules 38(b) of the Federal Rules of Civil Procedure, Plaintiff  
hereby demands trial by jury.

Dated: April 14, 2015

The Law Offices of Shawn A. McMillan, A.P.C.



Shawn A. McMillan, Esq.  
Stephen D. Daner, Esq.  
Dennis B. Atchley, Esq.  
Attorneys for Plaintiff B.R.

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