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7 Attorney for Plaintiff

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 SAN DIEGO COUNTY - NORTH COUNTY REGIONAL CENTER

10
11 JOSE A. RAMIREZ, an individual

12 Plaintiff

13 v.

14 TOYOTA MOTOR SALES, U.S.A., INC.,
15 a California corporation; and DOES 1
16 through 10,

17 Defendants.


Case No.: 37-2012-00054566-CU-BT-NC

COMPLAINT FOR VIOLATION OF SONG-
BEVERLY CONSUMER WARRANTY ACT

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1. For general damages in an amount to be proven at trial;
2. For rescission of the purchase contract and restitution of \$42,604.96;
3. For a civil penalty of \$83,209.92 under the Warranty Act;
4. For prejudgment interest at the legal rate;
5. For attorney's fees, costs of suit, and out-of-pocket expenses; and
6. For such other and further relief as the Court deems just and proper under the circumstances.

LAW OFFICE OF MICHAEL R. VACHON, ESQ.
Attorney for Plaintiff Jose A. Ramirez



Michael R. Vachon, Esq.

Date: June 18, 2011

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16 Defendants.

Case No.:

PLAINTIFF'S VENUE DECLARATION

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1 I, Michael R. Vachon, Esq. declare as follows:

2 1. I am over 18 years of age and an attorney for Plaintiff in this action. I
3 make this declaration to the best of my knowledge, information and belief of the facts
4 stated herein.

5 2. I am informed and believe that Plaintiff Jose Ramirez resided in the San
6 Diego County both at the time the contract giving rise to this action was entered into
7 and also at the commencement of this action.


8 3. Based on the purchase contract for the motor vehicle that is the subject of
9 this lawsuit, that contract was signed and entered into in Escondido, California.

10 4. Plaintiff's complaint filed in this matter contains a cause of action arising
11 from the offer and the provision of goods and services for personal, family, and/or
12 household use.

13 5. Per the foregoing assertions, this cause of action has been properly
14 commenced in the proper county or judicial district for trial under Code of Civil
15 Procedure Section 395(b).

16 On penalty of perjury, under the laws of the State of California, I swear that the
17 facts stated in this declaration are true.

18 Date: June 18, 2012


Michael R. Vachon, Esq.

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