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9 Attorneys for Plaintiff
10 SALVADOR H. MORALES

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **COUNTY OF LOS ANGELES**

13 SALVADOR H. MORALES,
14 Plaintiffs,
15 vs.
16 LOS ANGELES COUNTY
17 METROPOLITAN TRANSPORTATION
18 AUTHORITY,
19 Defendants.

20 **Case No. :** BC339557
21 **(Case assigned to the Honorable Joseph Kalin)**

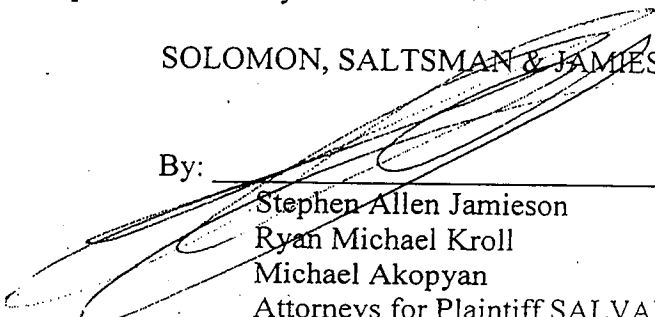
22 **NOTICE OF ENTRY OF AMENDED**
23 **JUDGMENT FOLLOWING RULING ON**
24 **ATTORNEYS' FEES**

25 **TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD AND TO THIS**
26 **HONORABLE COURT:**

27 **PLEASE TAKE NOTICE** that on September 23, 2008 the Amended Judgment was
28 executed and entered in the above-entitled proceeding. A copy of said executed and entered
Judgment is attached hereto and incorporated herein by this reference.

Dated: November 3, 2008

SOLOMON, SALTSMAN & JAMIESON

By: 
Stephen Allen Jamieson
Ryan Michael Kroll
Michael Akopyan
Attorneys for Plaintiff SALVADOR MORALES

SEP 02 2008

1 PREPARED BY:
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FILED
LOS ANGELES SUPERIOR COURT

SEP 23 2008
JOHN A. CLARKE, CLERK
S. Barrett
BY S. BARRETT, DEPUTY

7 Attorneys for Plaintiff
8 Salvador H. Morales

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 COUNTY OF LOS ANGELES

12 SALVADOR H. MORALES,
13 Plaintiffs,
14 vs.
15 LOS ANGELES COUNTY
16 METROPOLITAN TRANSPORTATION
17 AUTHORITY,
18 Defendants.

Case No. : BC339557
(Case assigned to the Honorable Joseph Kalin)
Department: 3
~~PROPOSED~~ JUDGMENT ON SPECIAL
VERDICT AS AGAINST DEFENDANT LOS
ANGELES COUNTY METROPOLITAN
TRANSPORTATION AUTHORITY

19 TO ALL PARTIES AND INTERESTED PERSONS, PLEASE TAKE NOTICE THAT
20 This Action came on regularly for trial on August 4, 2008 in Department 3 of the Los Angeles
21 County Superior Court in Los Angeles, CA, the Honorable Joseph Kalin Presiding; the Plaintiff
22 appearing by attorneys Stephen Allen Jamieson and Ryan Kroll of Solomon, Saltsman and Jamieson
23 and the Defendants appearing by attorneys Bruce Cochran and Eduardo Montelongo of County
24 Counsel.

25 A jury of 12 persons was regularly impaneled and sworn. Witnesses were sworn and
26 testified. Upon admission of the evidence and arguments of counsel, the jury was duly instructed by
27 the Court and the cause was submitted to the jury with directions to return a Verdict. The jury
28 deliberated and thereafter returned into Court on August 19, 2008 with its Verdict in favor of

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1 Plaintiff Salvador Morales and against Defendant Los Angeles County Metropolitan Transportation
2 Authority on the claim of Disability Discrimination in violation of California Government Code
3 § 12940.

4 The Special Verdict entitles Plaintiff to Judgment against Defendant in the amount of
5 \$2,247,137.00 and was rendered on August 19, 2008 as follows:

6
7 "The parties stipulate to the following:

- 8 1. The Los Angeles County Metropolitan Transportation Authority, referenced
9 hereinafter as "the MTA," was an employer.
- 10 2. Plaintiff Salvador Morales was an employee of the MTA.
- 11 3. The MTA knew that Salvador Morales had a physical condition that limited his ability
12 to work.
- 13 4. The MTA discharged Salvador Morales.

14 We answer the questions submitted to us as follows:

15 **Question Number 1:**
16 At the time the MTA discharged Salvador Morales was he able to perform the essential duties of his
17 job as a bus operator, or some available alternative job, with or without reasonable accommodation
18 for his condition?
19 Yes No

20 If your answer to Question Number 1 is "yes", then answer Question Number 2 next. If you
21 answered "no", stop here, and go directly to Question Number 4.

22 **Question Number 2:**
23 Was Salvador Morales' physical condition a motivating reason for the MTA's decision to discharge
24 Salvador Morales?
25 Yes No

26 If your answer to Question Number 2 is "yes", then answer Question Number 3 next. If you
27 answered "no", stop here, and go directly to Question Number 4.

28 **Question Number 3:**
Was the MTA's decision to discharge Salvador Morales a substantial factor in causing harm to
Salvador Morales?
 Yes No

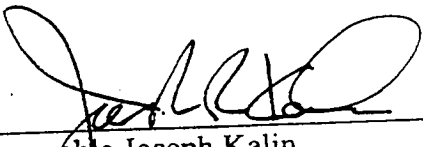
Please answer Question Number 4 next.

FILED
2008/08/19
COURT
CLERK

1 NOW, THEREFORE, IT IS ORDERED, ADJUDGED AND DECREED THAT:

2 Plaintiff Salvador Morales is hereby awarded Judgment against Defendant Los Angeles
3 County Metropolitan Transportation Authority for damages in the sum of \$2,247,137.00, plus pre-
4 Judgment interest thereon at the rate of seven (7) percent per annum from September 8, ²⁰⁰⁴ ~~2005~~ to
5 ~~October 3, 2007~~ ^{AUGUST 19, 2008} in the sum of \$30,707.00 ^{S.B.}, plus pre-Judgment interest thereon at the rate of ten
6 ~~(10) percent per annum, per Civil Code § 3291 and Code of Civil Procedure § 998, from October 4,~~
7 ~~2007 to August 19, 2008~~ in the sum of \$ _____, and Plaintiff is additionally entitled to
8 recover from Defendant the attorneys fees reasonably incurred of \$1,176,025 ⁰⁰, together with
9 costs and disbursements in the sum of \$104,963 ^{92 SB}; and the sum of all such damages,
10 interest, fees and costs in the total amount of \$3,563,832.92 shall bear post-Judgment
11 interest at the rate of ~~ten (10)~~ ^{SEVEN (7)} percent per annum from the date of Verdict of August 19, 2008 until
12 paid and the Judgment is satisfied in full.

13 Dated: ~~August~~ ^{SEPTEMBER} 27, 2008

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17 Honorable Joseph Kalin
18 Judge of the Superior Court
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PROOF OF SERVICE

1013A (3) CCP Rev. 1/1/88

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 426 Culver Boulevard, Playa del Rey, California 90293.

On November 4, 2008, I served on all interested parties in this action the foregoing document, described as:

NOTICE OF ENTRY OF AMENDED JUDGMENT FOLLOWING RULING ON ATTORNEYS' FEES

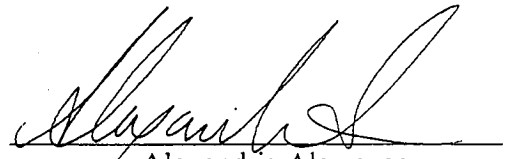
by placing a true copy thereof enclosed in sealed envelope(s) addressed as follows:

Bruce W. Cochran
Eduardo Montelongo
Office of the County Counsel, County of Los Angeles
One Gateway Plaza
Los Angeles, CA 90012-2952
Fax: (213) 922-2530

I deposited such envelopes in the mail at Playa del Rey, California. The envelope was mailed with first class postage thereon fully prepaid. I am "readily familiar" with the firm's practice of collection and processing of correspondence for mailing. It is deposited with the U.S. Postal Service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if the postal cancellation date or the postage meter date is more than 1 day after date of deposit for mailing in this Proof of Service.

Executed on November 4, 2008 at Playa del Rey, California.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.


Alexandria Alamango