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Attorneys for Plaintiffs
VERTICAL WEB VENTURES, INC., JACKIE
McKINLEY, SELINE KARAKAYA, AND
CHRISTOPHER LEE

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN BERNARDINO

VERTICAL WEB VENTURES, INC.,
JACKIE McKINLEY, SELINE
KARAKAYA, AND CHRISTOPHER
LEE,

Plaintiffs,

v.

ARROWHEAD LAKE ASSOCIATION,
GARY CLIFFORD, ROBERT
MATTISON; ALAN B. KAITZ, BRIAN
C. HALL, ERAN HEISSLER, ANTHONY
O'KEEFE, CHRISTOPHER WILSON,
and DOES 1 to 10;

Defendant.

CASE NO. CIVSB2120604

UNLIMITED CIVIL

FIRST AMENDED COMPLAINT FOR:

- (1) BREACH OF CONTRACT
- (2) INFRINGEMENT OF PROPERTY RIGHTS
- (3) BREACH OF COVENANT OF GOOD FAITH AND FAIR DEALING
- (4) INTERFERENCE WITH EASEMENT
- (5) DECLARATORY RELIEF
- (6) INJUNCTIVE RELIEF
- (7) RACE AND NATIONAL ORIGIN DISCRIMINATION AND HARASSMENT
- (8) GENDER DISCRIMINATION AND HARASSMENT
- (9) RETALIATION IN VIOLATION OF PUBLIC POLICY
- (10) PRIVATE NUISANCE
- (11) PUBLIC NUISANCE

DEMAND FOR JURY TRIAL

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN BERNARDINO
SAN BERNARDINO DISTRICT
SEP - 3 2021
BY *Leanne M. Landeros*
LEANNE M. LANDEROS, DEPUTY

No Summons Issued

By Fax

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SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN BERNARDINO
SAN BERNARDINO DISTRICT

