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7 *Attorneys for Plaintiff Dmitry Borodaenko,*  
 8 *on behalf of himself and all others similarly situated*

9  
 10 **UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
 11 **SAN FRANCISCO DIVISION**

12  
 13 DMITRY BORODAENKO, on behalf of  
 14 himself and all others similarly situated,

15 Plaintiff,

16 v.

17 TWITTER, INC.

18 Defendant  
 19  
 20  
 21  
 22

Case No. 3:22-cv-7226

**CLASS ACTION COMPLAINT AND  
 JURY DEMAND**

1. DISCRIMINATION IN VIOLATION OF THE AMERICANS WITH DISABILITIES ACT, 42 U.S.C. §§ 12101, *et seq.*
2. DISCRIMINATION IN VIOLATION OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT, Gov. Code § 12940
3. DECLARATORY JUDGMENT ACT, 28 U.S.C. §§ 2201-02

1 **I. INTRODUCTION**

2 1. Plaintiff Dmitry Borodaenko files this Class Action Complaint against Defendant  
3 Twitter, Inc. (“Twitter”), on his own behalf and on behalf of other disabled Twitter employees  
4 across the country who have been discharged or constructively discharged from their jobs during  
5 the chaotic weeks since multi-billionaire Elon Musk purchased the company.  
6

7 2. Plaintiff brings claims of discrimination under the Americans With Disabilities  
8 Act (“ADA”), 42 U.S.C. §§ 12101, *et seq.*, and (for employees who worked out of California)  
9 California Fair Employment and Housing Act (“FEHA”), Gov. Code § 12940, challenging the  
10 company’s termination, or constructive termination, of employees with disabilities who can  
11 perform their jobs with or without reasonable accommodation but who were not permitted to  
12 continue their jobs, either through termination or forced resignation after being required to accept  
13 working under unreasonable circumstances for an employee with a disability.

14 3. As described further below, shortly after Elon Musk completed his purchase of  
15 Twitter, he immediately began laying off half of its workforce.

16 4. Many of the employees who have lost their jobs since Musk’s purchase of the  
17 company are disabled.

18 5. Prior to Musk’s purchase of the company, Twitter employees were permitted to  
19 work remotely. In fact, over the spring and summer of 2022, Twitter reassured employees that,  
20 following Musk’s purchase of the company, they would be permitted to continue working  
21 remotely for at least a year.

22 6. However, shortly after Musk completed the purchase of Twitter, he declared that  
23 working remotely would no longer be allowed and that all remaining employees would need to  
24 work out of a company office – with only rare exceptions for “exceptional” employees, that  
25 Musk himself would have to approve.  
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1           13. Plaintiff seeks immediate injunctive relief, as well as a declaratory judgment  
2 under the Declaratory Judgment Act, 28 U.S.C. §§ 2201-02, on behalf of himself and all  
3 similarly situated employees.

4 **II. PARTIES**

5           14. Plaintiff Dmitry Borodaenko is an adult resident of Scotts Valley, California,  
6 where he worked for Twitter from June 2021 until November 2022.

7           15. Plaintiff brings this lawsuit as a Rule 23 class action on behalf of all similarly  
8 situated disabled Twitter employees across the United States whose jobs have been affected by  
9 the company’s layoffs, terminations, and heightened demands on the workforce.

10           16. Defendant Twitter, Inc. (“Twitter”) is a Delaware corporation, headquartered in  
11 San Francisco, California.

12 **III. JURISDICTION**

13           17. This Court has jurisdiction over this proceeding pursuant to 28 U.S.C. § 1331 and  
14 29 U.S.C. § 2104(a)(5).

15           18. This Court has supplemental jurisdiction under 28 U.S.C. § 1367 over Plaintiff’s  
16 state law claims, because those claims derive from a common nucleus of operative facts with  
17 Plaintiff’s federal claims.

18           19. This Court has personal jurisdiction over Twitter, as it is headquartered in this  
19 District and conducts substantial business operations in this District.

20 **IV. STATEMENT OF FACTS**

21           20. Twitter is a social media company that employs thousands of people across the  
22 United States.

23           21. In April 2022, it was announced that multi-billionaire Elon Musk would be  
24 purchasing the company.  
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1 Elon Musk Cuts Half of Twitter’s Staff, NEW YORK TIMES (November 4, 2022),  
2 <https://www.nytimes.com/2022/11/04/technology/elon-musk-twitter-layoffs.html>.

3  
4 30. Twitter’s new requirement that employees report to physical offices, as well as  
5 rampant terminations and layoffs, have affected disabled employees, including Plaintiff Dmitry  
6 Borodaenko.

7 31. Mr. Borodaenko worked as an Engineering Manager. Throughout his employment  
8 at Twitter, he worked remotely from his home. Indeed, when he was hired in June 2021, he was  
9 assured that he would always have the option to work remotely.

10 32. Mr. Borodaenko has a disability that makes him vulnerable to COVID-19. Thus,  
11 working from an office while the pandemic is still ongoing would create an unacceptable risk to  
12 his health and life.

13 33. Mr. Borodaenko informed his manager of his disability and how it prevented him  
14 from working out of a company office.

15 34. Following Musk’s announcement that employees would have to work out of  
16 company offices, Mr. Borodaenko wrote to his manager: “In case I didn't mention it before, as  
17 [a] cancer survivor I'm at extra risk from Covid (it also counts as a disability), so I'm definitely  
18 not working from [the] office until the pandemic is over.”

19 35. Mr. Borodaenko was not given any information about how formally to request an  
20 “exception” to the return to the office policy that Musk instituted at Twitter.

21 36. Not long after sending this message to his manager, Mr. Borodaenko was  
22 terminated.

23 37. On November 15, 2022, Mr. Borodaenko received an email from Twitter Human  
24 Resources that stated: “Hi, We regret to inform you that your employment is terminated effective  
25 immediately. Your recent behavior has violated company policy.”  
26  
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1           38. Mr. Borodaenko had not received any notice of behavior he was alleged to have  
2 engaged in that violated company policy, nor did he engage in any behavior that would appear to  
3 him to have violated company policy (other than informing his manager that he could not  
4 comply with Musk’s demand that employees begin working out of company offices).

5           39. In addition to the requirement that employees begin working out of company  
6 offices, Musk also made clear that working for Twitter would demand extraordinary effort and  
7 long work hours.

8           40. Following Musk’s purchase of the company, employees have been reported to  
9 have worked 12 hour shifts, 7 days a week. Some employees were told: “The expectation is  
10 literally to work 24/7 to get this out.” Some employees slept in Twitter offices while being  
11 required to work around the clock. Grace Dean, Twitter staff have been told to work 84- weeks  
12 and managers slept at the office over the weekend as they scramble to meet Elon Musk’s Tight  
13 deadlines, reports say, BUSINESS INSIDER (Nov. 1, 2022), [https://www.businessinsider.com/elon-](https://www.businessinsider.com/elon-musk-twitter-staff-layoffs-long-hours-shifts-work-jobs-2022-11)  
14 [musk-twitter-staff-layoffs-long-hours-shifts-work-jobs-2022-11](https://www.businessinsider.com/elon-musk-twitter-staff-layoffs-long-hours-shifts-work-jobs-2022-11).

15           41. These demands occurred while the company was in the process of mass layoffs,  
16 thus signaling to employees that these extraordinary efforts were required in order to keep their  
17 jobs.

18           42. Indeed, Mr. Borodaenko’s workload vastly increased following the beginning of  
19 Twitter’s mass layoffs. As a manager, the number of employees assigned to report to him  
20 increased from about 10 to 16.

21           43. On November 16, 2022, Musk sent the following email to remaining Twitter  
22 employees:

23  
24           Going forward, to build a breakthrough Twitter 2.0 and succeed in an increasingly  
25 competitive world, we will need to be extremely hardcore. This will mean working long  
26 hours at high intensity. Only exceptional performance will constitute a passing grade.

1 Twitter will also be much more engineering-driven. Design and product management will  
2 still be very important and report to me, but those writing great code will constitute the  
3 majority of our team and have the greatest sway. At its heart, Twitter is a software and  
servers company, so I think this makes sense.

4 If you are sure that you want to be part of the new Twitter, please click yes on the link  
5 below:

6 [LINK]

7 Anyone who has not done so by 5pm ET tomorrow (Thursday) will receive three months  
8 of severance.

9 Whatever decision you make, thank you for your efforts to make Twitter successful.

10 Elon

11 44. This further ultimatum from Musk that working at Twitter will require “working  
12 long hours at high intensity”, in which “[o]nly exceptional performance” will be acceptable, is  
13 highly discriminatory against disabled employees.

14 45. This ultimatum does not allow for employees who require reasonable  
15 accommodation for their disabilities but who are nevertheless capable of adequately performing  
16 their jobs.

17 46. Further, this ultimatum, as well as Musk’s behavior since he took control of  
18 Twitter, is clearly deterring disabled employees from feeling they can continue to work at the  
19 company. Plaintiff asserts that Twitter’s requirements for employees, under Musk’s leadership,  
20 will force many disabled employees to leave their jobs.

21 47. As indicated in the November 16<sup>th</sup> email from Musk, Twitter has indicated that  
22 employees who do not accept Musk’s ultimatum will receive a severance package. Plaintiff is  
23 concerned that, absent court intervention, as part of that severance package, Twitter will seek  
24 releases from employees without informing them of their rights, including their right to challenge  
25 Twitter’s actions as discriminatory, or the pendency of this case. Plaintiff therefore seeks  
26 immediate relief to ensure that Twitter does not violate the law and then seek to obtain releases  
27



1 from the many employees who do not have notice of their rights or the pendency of the claims  
2 brought here on their behalf.

3 48. Indeed, Elon Musk engaged in similar behavior with respect to mass layoffs  
4 conducted earlier this year at another company he owns, Tesla. In the summer of 2022, Tesla  
5 engaged in mass layoffs without providing advanced written notice as required by the federal and  
6 California WARN Acts. Former Tesla employees brought a suit against Tesla for these violations.  
7 See Lynch et al. v. Tesla, Inc., Civ. Act. No., 1:22-cv-00597-RP (W.D. Tex.). Tesla sought to  
8 obtain full releases of all federal and California WARN Act claims in exchange for small  
9 severance payments for less than the employees were legally entitled to, as alleged in the federal  
10 lawsuit. (Tesla offered one or two weeks' severance pay, rather than the 60 days pay required to  
11 satisfy the federal and California WARN Acts). See Lynch, 2022 WL 4295295, at \*1-4.) A  
12 federal court ruled that Tesla's conduct was "misleading because [the separation agreements] fail  
13 to inform potential class members of this lawsuit and the rights that they are potentially giving up  
14 under the WARN Act." Id. at \*4.

15 49. With respect to employees who were laid off by Twitter following Musk's  
16 purchase of the company, Twitter stated that it would begin distributing severance agreements,  
17 including releases of claims, beginning last week. However, after employees filed a class action  
18 lawsuit and emergency motion seeking to block the distribution of releases without employees  
19 being informed of their claims and the pendency of the case, see Cornet et al v. Twitter, Inc., C.A.  
20 No. 3:22-cv-06857-JD (N.D. Cal.) (Dkts. 6 and 7), Twitter agreed not to distribute releases until  
21 after the plaintiffs' motion could be heard (assuming it could be heard promptly).

22 50. In this case as well, Plaintiff seeks immediate relief to ensure that Twitter does  
23 not violate the law and then seek to obtain releases from the many disabled Twitter employees  
24 who do not have notice of their rights or the pendency of the claims brought here on their behalf.  
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1 **COUNT I**

2 **Americans With Disabilities Act,**  
3 **42 U.S.C. §§ 12101, *et seq.***

4 Plaintiff and other employees with disabilities, or who have been perceived to be disabled,  
5 who have worked for Twitter, and could perform the essential functions of their job with or  
6 without reasonable accommodation, have been entitled to the protections of the Americans With  
7 Disabilities Act (“ADA”), 42 U.S.C. §§ 12101, *et seq.* Plaintiff is disabled, as defined by the  
8 ADA, 42 U.S.C. § 12102, and could perform the essential functions of his job with the  
9 reasonable accommodation of working remotely. Twitter required its employees, including  
10 Plaintiff, to report physically to its offices, and terminated Plaintiff after he requested that he be  
11 permitted to continue to work remotely on account of his disability. Twitter, through the rigid  
12 enforcement of its return to office policy, as well as its unreasonable physical demands on  
13 employees since Elon Musk’s purchase of the company, has discriminated against Plaintiff and  
14 other disabled Twitter employees in violation of the ADA.

15 **COUNT II**

16 **California Fair Employment and Housing Act,**  
17 **Gov. Code § 12940**

18 Plaintiff and other employees with disabilities, or who have been perceived to be disabled,  
19 who have worked for Twitter in California, and could perform the essential functions of their job  
20 with or without reasonable accommodation, have been entitled to the protections of the  
21 California Fair Employment and Housing Act (“FEHA”), Gov. Code § 12940. Plaintiff is  
22 disabled, as defined by the FEHA, Gov. Code § 12926.1, and could perform the essential  
23 functions of his job with the reasonable accommodation of working remotely. Twitter required  
24 its employees, including Plaintiff, to report physically to its offices, and terminated Plaintiff after  
25 he requested that he be permitted to continue to work remotely on account of his disability.  
26 Twitter, through the rigid enforcement of its return to office policy, as well as its unreasonable  
27

1 physical demands on employees since Elon Musk’s purchase of the company, has discriminated  
2 against Plaintiff and other disabled Twitter employees who have worked in California in  
3 violation of the FEHA.  
4

5 **COUNT III**

6 **Declaratory Judgment Act,**  
7 **28 U.S.C. §§ 2201-02**

8 Plaintiff seeks a declaratory judgment and an injunction prohibiting Twitter from  
9 soliciting disabled employees to sign separation agreements that release their discrimination  
10 claims asserted herein, without first informing them of their rights under these statutes, the  
11 pendency of this case filed on their behalf, and Plaintiff’s counsel’s contact information.

12 **JURY DEMAND**

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14 Plaintiff requests a trial by jury on the claims asserted here.

15  
16 WHEREFORE, Plaintiff requests that this Court enter the following relief:

- 17
- 18 a. Declare and find that Twitter is liable to Plaintiff and other similarly situated disabled  
19 employees under the Americans With Disabilities Act, 42 U.S.C. §§ 12101, *et seq.*,  
20 and, with respect to employees who have worked out of California, the Fair  
21 Employment and Housing Act, Gov. Code § 12940;
  - 22 b. Certify this case as a class action;
  - 23 c. Enter declaratory relief and an injunction enjoining Twitter from seeking releases of  
24 claims asserted herein from employees without first informing them of their rights  
25 under the law, the pendency of this lawsuit, and contact information for Plaintiffs’  
26 counsel;
- 27  
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- 1 d. Reinstatement of disabled employees who wish to return to their jobs with reasonable  
2 accommodations;
- 3 e. Award of compensatory and any other appropriate damages, in an amount according to  
4 proof;
- 5 f. Award of pre- and post-judgment interest;
- 6 g. Award of reasonable attorneys' fees, costs, and expenses; and
- 7 h. Award of any other relief to which Plaintiff and other similarly situated Twitter  
8 employees may be entitled.
- 9

10 Respectfully submitted,

11  
12 DMITRY BORODAENKO, on behalf of himself  
13 and all others similarly situated,

14 By his attorneys,

15  
16 /s/ Shannon Liss-Riordan  
17 Shannon Liss-Riordan, SBN 310719  
18 Thomas Fowler (*pro hac vice* forthcoming)  
19 LICHTEN & LISS-RIORDAN, P.C.  
20 729 Boylston Street, Suite 2000  
21 Boston, MA 02116  
22 (617) 994-5800  
23 Email: sliss@llrlaw.com; tfowler@llrlaw.com

24 Dated: November 16, 2022

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CIVIL COVER SHEET

The JS-CAND 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved in its original form by the Judicial Conference of the United States in September 1974, is required for the Clerk of Court to initiate the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Dmitry Borodaenko, on behalf of himself and all others similarly situated

(b) County of Residence of First Listed Plaintiff (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number) Shannon Liss-Riordan, Thomas Fowler Lichten & Liss-Riordan, P.C., 729 Boylston St. Suite 2000, Boston, MA 02116, 617-994-5800

DEFENDANTS

Twitter, Inc.

County of Residence of First Listed Defendant (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff
2 U.S. Government Defendant
3 Federal Question (U.S. Government Not a Party)
4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

Table with columns for Plaintiff (PTF) and Defendant (DEF) citizenship: Citizen of This State, Citizen of Another State, Citizen or Subject of a Foreign Country, Incorporated or Principal Place of Business In This State, Incorporated and Principal Place of Business In Another State, Foreign Nation.

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Large table with categories: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, HABEAS CORPUS, OTHER, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES.

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding
2 Removed from State Court
3 Remanded from Appellate Court
4 Reinstated or Reopened
5 Transferred from Another District (specify)
6 Multidistrict Litigation-Transfer
8 Multidistrict Litigation-Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): Americans With Disabilities Act ("ADA"), 42 U.S.C. §§ 12101, et seq.; California Fair Employment and Housing Act ("FEHA"), Gov. Code § 12940
Brief description of cause: Plaintiff brings this complaint against Twitter on behalf of a class for disability discrimination in violation of the ADA and FEHA.

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, Fed. R. Civ. P. DEMAND \$ JURY DEMAND: X Yes No

VIII. RELATED CASE(S), IF ANY (See instructions):

JUDGE DOCKET NUMBER

IX. DIVISIONAL ASSIGNMENT (Civil Local Rule 3-2)

(Place an "X" in One Box Only) X SAN FRANCISCO/OAKLAND SAN JOSE EUREKA-MCKINLEYVILLE

DATE 11/16/2022

SIGNATURE OF ATTORNEY OF RECORD

/s/ Shannon Liss-Riordan

**INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS-CAND 44**

**Authority For Civil Cover Sheet.** The JS-CAND 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved in its original form by the Judicial Conference of the United States in September 1974, is required for the Clerk of Court to initiate the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I. a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
  - b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the “defendant” is the location of the tract of land involved.)
  - c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section “(see attachment).”
- II. Jurisdiction.** The basis of jurisdiction is set forth under Federal Rule of Civil Procedure 8(a), which requires that jurisdictions be shown in pleadings. Place an “X” in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
- (1) United States plaintiff. Jurisdiction based on 28 USC §§ 1345 and 1348. Suits by agencies and officers of the United States are included here.
  - (2) United States defendant. When the plaintiff is suing the United States, its officers or agencies, place an “X” in this box.
  - (3) Federal question. This refers to suits under 28 USC § 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
  - (4) Diversity of citizenship. This refers to suits under 28 USC § 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS-CAND 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an “X” in the appropriate box. If the nature of suit cannot be determined, be sure the cause of action, in Section VI below, is sufficient to enable the deputy clerk or the statistical clerk(s) in the Administrative Office to determine the nature of suit. If the cause fits more than one nature of suit, select the most definitive.
- V. Origin.** Place an “X” in one of the six boxes.
- (1) Original Proceedings. Cases originating in the United States district courts.
  - (2) Removed from State Court. Proceedings initiated in state courts may be removed to the district courts under Title 28 USC § 1441. When the petition for removal is granted, check this box.
  - (3) Remanded from Appellate Court. Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
  - (4) Reinstated or Reopened. Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
  - (5) Transferred from Another District. For cases transferred under Title 28 USC § 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
  - (6) Multidistrict Litigation Transfer. Check this box when a multidistrict case is transferred into the district under authority of Title 28 USC § 1407. When this box is checked, do not check (5) above.
  - (8) Multidistrict Litigation Direct File. Check this box when a multidistrict litigation case is filed in the same district as the Master MDL docket. Please note that there is no Origin Code 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC § 553. Brief Description: Unauthorized reception of cable service.
- VII. Requested in Complaint.** Class Action. Place an “X” in this box if you are filing a class action under Federal Rule of Civil Procedure 23. Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction. Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS-CAND 44 is used to identify related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.
- IX. Divisional Assignment.** If the Nature of Suit is under Property Rights or Prisoner Petitions or the matter is a Securities Class Action, leave this section blank. For all other cases, identify the divisional venue according to Civil Local Rule 3-2: “the county in which a substantial part of the events or omissions which give rise to the claim occurred or in which a substantial part of the property that is the subject of the action is situated.”
- Date and Attorney Signature.** Date and sign the civil cover sheet.