

# SUMMONS (CITACION JUDICIAL)

FOR COURT USE ONLY  
(SOLO PARA USO DE LA CORTE)

**NOTICE TO DEFENDANT:  
(AVISO AL DEMANDADO):**  
DEBORAH J. JOHNSON, DOES 1 through 10, inclusive

**YOU ARE BEING SUED BY PLAINTIFF:  
(LO ESTÁ DEMANDANDO EL DEMANDANTE):**  
JOSEPH C. STYGER

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center ([www.courtinfo.ca.gov/selfhelp](http://www.courtinfo.ca.gov/selfhelp)), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site ([www.lawhelpcalifornia.org](http://www.lawhelpcalifornia.org)), the California Courts Online Self-Help Center ([www.courtinfo.ca.gov/selfhelp](http://www.courtinfo.ca.gov/selfhelp)), or by contacting your local court or county bar association.

*Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California ([www.courtinfo.ca.gov/selfhelp/espanol/](http://www.courtinfo.ca.gov/selfhelp/espanol/)), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.*

*Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, ([www.lawhelpcalifornia.org](http://www.lawhelpcalifornia.org)), en el Centro de Ayuda de las Cortes de California, ([www.courtinfo.ca.gov/selfhelp/espanol/](http://www.courtinfo.ca.gov/selfhelp/espanol/)) o poniéndose en contacto con la corte o el colegio de abogados locales.*

The name and address of the court is:  
(El nombre y dirección de la corte es):

Superior Court of California  
400 McAllister Street  
San Francisco, CA 94102

CASE NUMBER:  
(Número del Caso):

CSB-08-477322

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:

(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):  
Marc Seidenfeld, Esq. CSB #98245 650-877-8253  
24 Linden Avenue, South San Francisco, CA 94080

P. NATT

DATE:  
(Fecha) JUL 10 2008

Gordon Park-Li

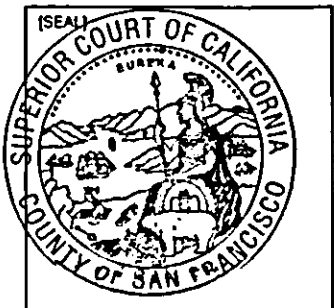
Clerk, by  
(Secretario)

*P. Matt*  
Deputy  
(Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)  
(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).

**NOTICE TO THE PERSON SERVED: You are served**

1.  as an individual defendant.
2.  as the person sued under the fictitious name of (specify):
3.  on behalf of (specify):  
under:  CCP 416.10 (corporation)  CCP 416.60 (minor)  
 CCP 416.20 (defunct corporation)  CCP 416.70 (conservatee)  
 CCP 416.40 (association or partnership)  CCP 416.90 (authorized person)  
 other (specify):
4.  by personal delivery on (date):



FOR COURT USE ONLY

**FILED**  
San Francisco County Superior Court

JUL 10 2008

GORDON PARK-LI, Clerk

BY Karau Matt  
Deputy Clerk

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):  
Marc Seidenfeld CSB #98245  
Attorney at Law  
24 Linden Avenue  
South San Francisco, CA 94080  
TELEPHONE NO.: 650-877-8253 FAX NO.:  
ATTORNEY FOR (Name): Plaintiff Joseph C. Styger

SUPERIOR COURT OF CALIFORNIA, COUNTY OF San Francisco  
STREET ADDRESS: 400 McAllister Street  
MAILING ADDRESS:  
CITY AND ZIP CODE: San Francisco, CA 94102  
BRANCH NAME:

CASE NAME:  
Styger v. Johnson, et al.

**CIVIL CASE COVER SHEET**  
 Unlimited (Amount demanded exceeds \$25,000)  Limited (Amount demanded is \$25,000 or less)

Complex Case Designation  
 Counter  Joinder  
Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)

CASE NUMBER:  
**666-88-477322**  
JUDGE:  
DEPT:

Items 1-6 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:

**Auto Tort**

- Auto (22)
- Uninsured motorist (46)

**Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort**

- Asbestos (04)
- Product liability (24)
- Medical malpractice (45)
- Other PI/PD/WD (23)

**Non-PI/PD/WD (Other) Tort**

- Business tort/unfair business practice (07)
- Civil rights (08)
- Defamation (13)
- Fraud (16)
- Intellectual property (19)
- Professional negligence (25)
- Other non-PI/PD/WD tort (35)

**Employment**

- Wrongful termination (36)
- Other employment (15)

**Contract**

- Breach of contract/warranty (06)
- Rule 3.740 collections (09)
- Other collections (09)
- Insurance coverage (18)
- Other contract (37)

**Real Property**

- Eminent domain/Inverse condemnation (14)
- Wrongful eviction (33)
- Other real property (26)

**Unlawful Detainer**

- Commercial (31)
- Residential (32)
- Drugs (38)

**Judicial Review**

- Asset forfeiture (05)
- Petition re: arbitration award (11)
- Writ of mandate (02)
- Other judicial review (39)

**Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403)**

- Antitrust/Trade regulation (03)
- Construction defect (10)
- Mass tort (40)
- Securities litigation (28)
- Environmental/Toxic tort (30)
- Insurance coverage claims arising from the above listed provisionally complex case types (41)

**Enforcement of Judgment**

- Enforcement of judgment (20)

**Miscellaneous Civil Complaint**

- RICO (27)
- Other complaint (not specified above) (42)

**Miscellaneous Civil Petition**

- Partnership and corporate governance (21)
- Other petition (not specified above) (43)

2. This case  is  is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:

- a.  Large number of separately represented parties
- b.  Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve
- c.  Substantial amount of documentary evidence
- d.  Large number of witnesses
- e.  Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
- f.  Substantial postjudgment judicial supervision

3. Remedies sought (check all that apply): a.  monetary b.  nonmonetary; declaratory or injunctive relief c.  punitive

4. Number of causes of action (specify): One

5. This case  is  is not a class action suit.

6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: 7/9/08  
Marc Seidenfeld

(TYPE OR PRINT NAME)

Marc Seidenfeld  
(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

**NOTICE**

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

1 MARC SEIDENFELD CSB #98245  
2 Attorney at Law  
3 24 Linden Avenue  
4 South San Francisco, CA 94080  
5 Telephone: (650) 877-8253  
6 Attorney for Plaintiff

SUMMONS ISSUED  
FILED  
San Francisco County Superior Court

JUL 10 2008

GORDON PARK-LI, Clerk

BY: P. Natt Deputy Clerk  
P. NATT

8 SUPERIOR COURT OF CALIFORNIA  
9 CITY AND COUNTY OF SAN FRANCISCO

11 JOSEPH C. STYGER,  
12 Plaintiff,  
13 vs.

NO. 06C-88-477322  
VERIFIED COMPLAINT FOR DAMAGES  
FOR LIBEL

CASE MANAGEMENT CONFERENCE SET

14 DEBORAH J. JOHNSON,  
15 DOES 1 through 10,  
16 inclusive,  
17 Defendants.

DEC 12 2008 -9<sup>00</sup>AM

DEPARTMENT 212

18 Plaintiff alleges:

19 1. Defendant Deborah J. Johnson is and at all times mentioned  
20 herein was a resident of San Francisco County, California.

21 2. Plaintiff is ignorant of the true names and capacities of  
22 defendants sued herein as Does 1 through 10, inclusive, and  
23 therefore sues these defendants by such fictitious names.  
24 Plaintiff will amend this complaint to allege their true names and  
25 capacities when ascertained. Plaintiff is informed and believes  
26 and thereon alleges that each of the fictitiously named defendants  
27 is responsible in some manner for the occurrences herein alleged,  
28 and that plaintiff's damages as herein alleged were proximately

1 caused by their conduct.

2 3. Defendants Johnson and Does 1 through 10, inclusive, at  
3 all times mentioned herein were the agents and employees of each  
4 other and in doing the things hereinafter alleged were acting  
5 within the course and scope of such agency and with the permission  
6 and consent of each other.

7 4. At all times mentioned herein, plaintiff was and is now a  
8 dentist and has been practicing dentistry since 1981 and was and is  
9 doing business as such in the City and County of San Francisco, and  
10 has been doing so in San Francisco since 1995.

11 5. At all times, plaintiff has enjoyed a good reputation both  
12 generally and in his occupation.

13 6. Defendants published a review of plaintiff's work as a  
14 dentist on a website known as Yelp.com, which stated: "He  
15 absolutely ruined my beautiful teeth. I asked if there was  
16 anything I could do to whiten them and the next thing I knew, he  
17 was giving me veneers without explaining anything. The veneers he  
18 put on don't even cover my teeth and you can see the stained teeth  
19 underneath. He did not even offer to fix them. Styger is the most  
20 unethical dentist I have ever met in my life. He recommended  
21 several treatments that I didn't need and that were costly. Be  
22 very, very wary."

23 7. The entire statement of defendants is false as it pertains  
24 to plaintiff.

25 8. This statement is libelous on its face. It clearly  
26 exposes plaintiff to hatred, contempt, ridicule and obloquy because  
27 it states that plaintiff is unethical and that he is incompetent in  
28 his work as a dentist.

1           9. This statement was seen and read by numerous persons who  
2 reside in and around San Francisco, California.

3           10. As a proximate result of the above described publication,  
4 plaintiff has suffered loss of his reputation, shame, mortification  
5 and hurt feelings, all to his general damage.

6           11. As a further proximate result of the above described  
7 publication, plaintiff has suffered special damages in that he has  
8 been injured in his profession and business, as the publication  
9 states that plaintiff is unethical and is an incompetent dentist.  
10 There has been a sharp decline in the number of new patients and in  
11 the amount of income normally to be expected by plaintiff as a  
12 direct result of defendants' publication. Plaintiff does not at  
13 this time know the exact amount of pecuniary loss resulting from  
14 the foregoing, but is informed and believes and therefore alleges  
15 that said loss is a continuing one and that the amount of said loss  
16 will be in the amount of \$100,000.00 lost income or more, and  
17 plaintiff will amend this allegation to insert the true amount of  
18 said loss when the same becomes known to him.

19           12. The above described publication was published by  
20 defendants with malice and oppression to accuse plaintiff of  
21 malpractice and of being unethical. Defendants previously sued  
22 plaintiff for malpractice and lost that case. The court in that  
23 case ruled that there was no malpractice and ruled for plaintiff.  
24 Plaintiff therefore seeks an award of punitive and exemplary  
25 damages.

26           WHEREFORE, plaintiff prays judgment against defendants, and  
27 each of them, as follows:

- 28           1. For general damages according to proof;

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

- 2. For special damages according to proof;
- 3. For punitive and exemplary damages;
- 4. For costs of suit incurred herein; and
- 5. For such other and further relief as the court may deem proper.

DATED: 1/19/08

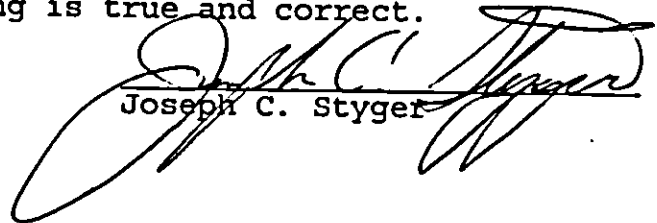
Marc Seidenfeld  
Marc Seidenfeld  
Attorney for Plaintiff

VERIFICATION

I, Joseph C. Styger, am the plaintiff in the above entitled action. I have read the foregoing complaint and know the contents thereof. The same is true of my own knowledge, except as to those matters that are therein alleged on information and belief, and as to those matters, I believe them to be true.

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

DATED: 7/9/08

  
Joseph C. Styger

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28