

Murchison & Cumming

-Lawyers-

M&C IN BRIEF

Fall 2004

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For more information please contact: Kathleen Lawler, Communications Director at (213) 630-1004.

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M&C BIDS FOND FAREWELL TO STEVE SMILAY



To My Friends and Colleagues:

After nearly 25 years at Murchison & Cumming, my wife and I have decided to leave California and move to Indiana. While I am excited about beginning a new life and facing new challenges in the Midwest, I will certainly miss the personal and professional relationships that I have enjoyed here over the years.

I will leave full of gratitude for having had the privilege of working with my colleagues at Murchison & Cumming for the past quarter century and with the greatest affection for them and for the firm which has been my home for half of my life. I know that the fine people who are the heart and soul of the firm will continue to provide outstanding client focused legal services long after I am gone.

Finally, I want to thank all of the clients with whom it has been my privilege to work. It has indeed been a privilege to have had the opportunity to collaborate with each of you in solving the legal challenges which we have faced together.

Upon my departure, the Business and Commercial Practices Group is going to be split into a transactions and a litigation group. The transactions group will be headed by my partner, James S. Williams who has built a strong transactional practice in our firm in order to further expand the services that the firm can provide to its clients. The litigation group will be headed by my partner, Corine Zygelman who is a bright, personable and aggressive litigator and will provide strong leadership to the litigation group.

Wishing you well in all your future endeavors, I am

Very Truly Yours,



BUSINESS & INTELLECTUAL PROPERTY LITIGATION



Corine Zygelman is chair of the firm's Business & Intellectual Property Litigation Group. She focuses her practice in the area of civil litigation with an emphasis on business, commercial and intellectual property. Ms. Zygelman counsels mid to large-sized companies in all aspects of

litigation including unfair competition, breach of contract, trademark and copyright infringement, invasion of privacy, risk management and rights. In addition, Ms. Zygelman and her team represent clients in all phases of litigation, from trial court to the appellate courts.

BUSINESS & TECHNOLOGY TRANSACTIONS

James S. Williams chairs the Business and Technology Transactions Group. He practices extensively in the areas of intellectual property, technology, new media, outsourcing and corporate law. Mr. Williams represents clients ranging from start-ups to Fortune 500 companies on complex



domestic and international transactions concerning the development, protection, licensing and outsourcing of intellectual property, proprietary technologies and business processes. Mr. Williams maintains an active outsourcing practice, routinely consulting on large-scale business process and technology sourcing deals.

M&C CASE REVIEW

WORKERS COMPENSATION CLAIM RAISES QUESTIONS OF NEGLIGENCE



Zamora v, Iesco, Inc.



Michael D. McEvoy

Richard D. Newman

Michael McEvoy and Richard Newman defended Iesco, a contractor working at a Chevron Refinery

Plaintiff was an employee of a Texas contractor performing maintenance work on a circular tower at a Chevron Oil Refinery. On the date of the accident, an Iesco employee had climbed a ladder on the exterior of the tower to work on a platform approximately 20 feet above ground level. Plaintiff was working on the ground underneath the platform. While the employee was working on the platform above, he accidentally knocked a tool weighing 7 1/2 pounds off the tower. The tool dropped about 20 feet before striking the plaintiff on the back of his hard hat and on the shoulder. Plaintiff underwent surgery for a rotator cuff repair. He also alleged disc injuries to the neck and back and has not worked since the accident. The Worker's Compensation Carrier paid \$46,000 in disability payments and \$47,000 in medical.

The plaintiff sued Iesco claiming negligence. The defense admitted negligence, but argued comparative fault. With respect to the injuries, defense presented a medical expert to challenge the reasonableness and necessity of the medical expenses, including challenging the shoulder surgery as having been necessitated by the accident.

The jury found the plaintiff 25% at fault and awarded \$21,000 for economic loss and \$29,000 for general damages. Defense had bought the Worker's Compensation lien and taken an assignment. Since the lien exceeded the plaintiff's recovery, plaintiff recovered nothing.

Michael McEvoy is the Partner in Charge of the firm's Orange County office. He focuses his practice on employment law, professional liability and product liability. Richard Newman is also resident in the Orange County office and focuses his practice on appellate matters.

SUCCESSFUL SUMMARY JUDGMENT IN PREMISES LIABILITY CASE



Bradley v. Los Angeles Neighborhood Housing



Michael J. Nunez

Robert R. Clayton

Michael Nunez and Robert Clayton successfully filed a motion for summary judgment in a premises liability case.

Plaintiff attended a seminar presented by L.A. Neighborhood Housing Services Corp. ("LA NHSC") at the Radisson Hotel in Los Angeles and alleged that she lost her footing and fell down the stairs that she was descending. Plaintiff's Complaint originally named only the property owner (i.e. Radisson Hotel) as a defendant. On the eve of trial, Plaintiff amended her Complaint to name LA NHSC. Plaintiff alleged that the defendants were negligent in the management and maintenance of the property because a dark stairwell was allowed to exist on the property.

Upon service of Plaintiff's amended Complaint, counsel for LA NHSC successfully moved for a trial continuance and filed a Motion for Summary Judgment. The defense moved for summary judgment on the grounds that the undisputed evidence in the case revealed that LA NHSC was not responsible and did not maintain the lighting on the premises. It was asserted that summary judgment was therefore warranted because LA NHSC owed no duty to Plaintiff.

Additionally LA NHSC asserted that Plaintiff admitted that she observed the lighting condition in the stairwell before she knowingly and voluntarily choosing to descend the stairs. Therefore, summary judgment was proper under the "open and obvious" defense as plaintiff was aware of the allegedly dangerous condition before her fall and thus, defendants had no duty to warn her of the same. The Court agreed, and granted LA NHSC's motion on both grounds. Judgment was entered in favor of LA NHSC and against Plaintiff.

Michael Nunez, a member of the firm's Law and Appellate practice group, wrote the motion and Robert Clayton, a member of the firm's Product Liability practice group, handled the case. Both are resident in the Los Angeles office.

M&C CASE REVIEW







BROKER NOT LIABLE IN PROFESSIONAL LIABILITY CASE

Vincent Long v. Fireman's Fund Insurance Company et al.

George Genzmer, Tina Varjian and Pascale Gagnon-Morris successfully defended a professional liability case involving a real estate broker.

Plaintiff was sued by his ex-girlfriend in an underlying action for alleged conversion of monies while acting as her real estate agent. At that time, the plaintiff was employed by defendant, a real estate broker who was also named in the lawsuit. The ex-girlfriend alleged plaintiff was acting in the course and scope of his employment when he converted her monies. Shortly after the underlying action was filed, plaintiff called the broker, his previous employer, acknowledging the underlying lawsuit. The plaintiff stated that the lawsuit had nothing to do the broker but involved the personal and business relationship between plaintiff and his ex-girlfriend. During this call, the plaintiff asked when he was employed by the broker and specifically which insurance carrier insured them. The broker stated that the plaintiff had been employed from 1991-1993 and that the insurance carrier at the time plaintiff was employed was Travelers. The insurance company has since left the state and there was no insurance coverage for plaintiff. The broker's current insurance carrier, Fireman's Fund, was defending the broker in the underlying action.

However, Fireman's Fund denied coverage to plaintiff in the underlying action. The plaintiff filed the present action against Fireman's Fund Insurance Company and broker/client alleging causes of action for conspiracy to defraud, negligent and intentional misrepresentation. The defense filed motions for summary judgment on behalf of Fireman's Fund Insurance Company and the broker. The Court's tentative was to grant Fireman's Fund Insurance Company's motion based upon finding that the plaintiff was not acting in the course and scope of his employment when he allegedly converted the monies and therefore there was no coverage under the policy terms. After oral argument by both sides the Court granted the broker's motion for summary judgment. Similarly, there was no negligent misrepresentation since plaintiff was not employed by the broker at the time of the subject telephone call and therefore no duty was owed to plaintiff to disclose any information to plaintiff including Fireman's Fund's decision to defend the broker in the underlying lawsuit.

George Genzmer and Pascale Gagnon-Morris are members of the firm's Professional Liability Practice Group. Tina Varjian, a member of the Law & Appellate Practice Group, drafted the motions. All are resident in the Los Angeles office.



Guy R. Gruppie







Josh M. Rosen

ESCALATOR MALFUNCTION RAISES PRODUCT LIABILITY AND NEGLIGENCE ISSUES

Mitsubishi Electric & Electronics USA v. Green

Guy Gruppie, Michael Nunez and Joshua Rosen and Michael J. Nunez recently obtained a partial summary judgment and voluntary dismissal of the remaining counts of a personal injury action filed against Mitsubishi by a Los

Angeles Police Dept. officer.

The officer alleged that in June 2002, the escalator he was riding on at the MTA's Westlake Red Line Station malfunctioned, stopped abruptly and caused him to suffer a significant injury to his left knee. The injury eventually required surgery, and the officer made a claim of medical expenses, pain & suffering, and lost wages.

Plaintiff's complaint alleged strict products liability, breach of warranty and negligence. The defense's motion for summary judgment/summary adjudication was partially granted, as the court ruled as a matter of law that Mitsubishi was not involved in the manufacture, sale, design or distribution of the escalator system/components. However, the court denied the motion on the negligence count.

Further discovery ensued after which plaintiff accepted Mitsubishi's Statutory Offer to Compromise for a waiver of costs and attorney fees, as the defense demonstrated through lay and expert witnesses that it breached no duty owed plaintiff in its maintenance of the escalator system. This case is the latest in a string of successful court rulings that Murchison & Cumming has obtained for Mitsubishi.

Guy Gruppie and Joshua Rosen are members of the firm's Product Liability Practice Group. Michael Nunez is a member of the firm's Law and Appellate Practice Group. All three are resident in the Los Angeles office.

CASE REVIEW





MOTION FOR SUMMARY JUDGMENT SUCCESSFUL ON "RECREATIONAL USE IMMUNITY"

Southern California Edison v. Bailey





Kate E. Gillespie Richard C. Moreno

Murchison & Cumming, LLP successfully obtained a motion for summary judgment in a personal injury case.

Two minor girls were injured when one of the girls contacted electrical equipment at a substation owned by Southern California Edison Company ("Edison"). The two girls lived in the neighborhood next to the substation. On the day of the incident, the girls were playing ball and the ball flew over the wall of the substation and into a fenced-off area containing the electrical equipment. The two girls decided to retrieve the ball and climbed onto the substation's surrounding brick wall and over into the substation. One of the girls then climbed a locked, chain link fence, measuring 6 feet tall, and jumped down into the area with the electrical equipment. As she was reaching for the ball, she made contact with the electrical equipment. Warning signs and "Do Not Enter" signs were posted around the perimeter of the substation, inside the substation, and around the perimeter of the chain link fence. Additionally, barbed wire, chain link fencing, and spikes were affixed to the outside brick wall.

Plaintiffs sued Edison for negligence and premises liability. In response, the defense filed a Motion for Summary Judgment based on a statutory immunity codified at Civil Code section 846, commonly known as the "recreational

use immunity." The immunity is intended to prohibit any negligence claims against property owners by uninvited, non-paying recreational users. Edison argued that the recreational use immunity applied in this instance because it met the two elements of section 846: (1) it owned the substation; and (2) plaintiffs' injuries resulted from their entry into the premises for a recreational purpose. Based on the legislative purpose, the statutory language, and current case law, the Court granted the defense's summary judgment motion. The Court found that not only did Edison own the substation, but that the girls' actions were included in the statutory definition of "recreation." Moreover, the Court held that none of the three statutory exceptions to the recreational use immunity applied. Namely, there was no evidence that (1) Edison willfully or maliciously failed to guard or warn against a dangerous condition on its property. guard or warn against a dangerous condition on its property; (2) Edison did not grant the plaintiffs permission to enter the property in exchange for a paid fee; and (3) Edison did not expressly invite plaintiffs to come upon its property. Accordingly, plaintiffs' entire complaint was barred and Edison was not *liable as a matter of law*.

Friedrich Seitz, Richard Moreno and Kate Gillespie are members of the firm's Product Liability Practice group. Gina Och is a member of the Law & Appellate practice group. All are resident in the firm's Los Angeles office.

M&C TRANSACTIONS

M&C REPRESENTS JBA INTERNATIONAL ON \$150 MILLION WORLDWIDE SOURCING **TRANSACTION**

On September 30, 2004, JBA International (www.jbai.com) inked a deal to provide offshore and onshore IT consulting services to Computer Sciences Corporation (NYSE: CSC) (www.csc.com). The multi-year agreement, if fully optioned, is valued at \$150 million.

Under the agreement, JBA International will deliver IT expertise to CSC's worldwide insurance and banking clients. Offshore consulting resources will be sourced from JBA International's wholly owned subsidiary, JBA Infotech, Pvt. Ltd., headquartered in Bangalore, India. Onshore consulting resources will be coordinated out of JBA International's North American headquarters in Pasadena, California.



James S. Williams





Jane Olivas Matsuda

The transaction was made more complex by JBA International's contemporaneous closing of a deal that saw it acquire long-time competitor Quest Sourcing, Inc., for an undisclosed sum. The Quest Sourcing acquisition was carefully structured and timed to further strengthen JBA International's worldwide delivery capabilities.

James S. Williams, a partner in Murchison & Cumming's Los Angeles office, advised JBA International on both deals. Mr. Williams was assisted by Los Angeles associates Truc Luu and Jane Matsuda.

M&C WELCOMES...

Adrian Barrio joined the Los Angeles office in September as a member of the Law & Appellate Practice Group. Mr. Barrio is a graduate of the University of California Los Angeles (B.A.) and the University of Illinois College of Law (J.D.). Prior to joining the firm, Mr. Barrio worked as a law clerk for U.S. District Judge Rebecca Pallmeyer and served as an editor of the Law Review.

Melissa Wood Eisenberg handles employment and general liability work in the Northern California office. Ms Eisenberg is a graduate of the University of San Francisco (B.A.) and the Golden Gate University School of Law (J.D.). Prior to joining the firm, Ms. Eisenberg worked for the Superior Court of Alameda County and as staff counsel for the Hartford Insurance Company.

Luanne Rutherford joined the Northern California office where she handles construction defect and products liability litigation. Ms. Rutherford is a graduate of the John Carroll University (B.S.) and Pepperdine University School of Law (J.D.).

PRODUCT LIABILITY

On October 14, 2004, Murchison & Cumming hosted the first annual Fall Symposium entitled "Product Liability: Strategies For Success." Excerpts from the seminar handout materials are included on the next two pages. For a complete copy, please contact Kathleen Lawler at (213) 630 1004.

REPORTING REQUIREMENTS UNDER THE TREAD ACT AND THE CONSUMER PRODUCT SAFETY ACT

By: Friedrich W. Seitz and Adrian Barrio

I. Reporting Requirements Under The TREAD Act

On November 1, 2000, Congress enacted the TREAD (Transportation Recall Enhancement, Accountability, and Documentation Act) Act, codified at 49 U.S.C. § 30101 et seq. (2003). The TREAD Act addresses several issues raised by the Ford/Firestone tire recall, such as defect reporting requirements, see 49 U.S.C. § 30166, enforcement measures, see 49 U.S.C. §§ 30165, 30170, and "significantly under inflated tires," see TREAD Act § 13.

Regarding defect reporting requirements, the focus of this memorandum, the TREAD Act requires automakers to notify the Secretary of Transportation within five days of discovery of a defect or the need for a safety recall. See 49 C.F.R. § 573.6. This requirement applies to related recalls in foreign countries as well. See 49 U.S.C. § 30166(1)(1),(2).

The Act requires dynamic rollover tests for SUVs and trucks and tougher standards in regulation of design and construction of child safety seats, specifically to side impact and head injuries. See 49 C.F.R. § 572.1 et seq.

The Act also establishes civil and criminal penalties for failure to comply with its regulations. Civil penalties may be as high as \$5,000 for each violation, with a maximum of \$15 *million* per day for accumulated daily violations. See 49 U.S.C. § 30165(a)(2). This is a risk some manufacturers may not be willing to take.

Continued on Page 6

APPLICATION OF PROP 51 IN PRODUCT LIABILITY CASES

By: Friedrich W. Seitz and Tina D. Varjian

On June 3, 1986, California passed Proposition 51 which is also known as The Fair Responsibility Act of 1986 and is codified in Civil Code §§ 1431-1431.5. Civil Code § 1431.2, was intended to make the tort system more equitable by partially eliminating the "deep pocket rule" of joint liability, which sometimes required a tortfeasor who might only be minimally culpable to bear all of the plaintiff's damages. <u>Hock v. Allied-Signal, Inc. 24</u>, Cal.App.4th 48 (1994).

Civil Code § 1431.2(a) provides:

"In any action for personal injury, property damage, or wrongful death, based upon principles of comparative fault, the liability of each defendant for non-economic damages shall be several only and shall not be joint. Each defendant shall be liable only for the amount of non-economic damages allocated to that defendant in direct proportion to that defendant's percentage of fault, and a separate judgment shall be rendered against that defendant for that amount."

Continued on Page 6

WITH HONORS

Russell S. Wollman, a partner at the firm has been elected to serve on the USLAW Network's Board of Directors. As a member of the 17-person board, Mr. Wollman will help facilitate the future growth of the organization through expanded educational programming, networking opportunities and member recruitment.

USLAW Network is an organization of independent law firms with offices throughout the United States. Through USLAW, these firms share information in order to enhance the speed, efficiency and quality of legal services provided to each member's clients.

Jean Dalmore Overton, a partner at Murchison & Cumming, LLP has been named a Southern California Super Lawyers' Rising Star. Elected by her peers, Ms. Dalmore has been recognized for her outstanding work as a construction law attorney. The list of Southern California Rising Stars, which is produced by <u>Los Angeles Magazine</u>, is compiled based on one-time nominations by 2004 Super Lawyers.

Ms. Dalmore is Co-Chair of the firm's Construction Law Practice Group. She focuses her practice on construction defect, representing general contractors, and subcontractors in all fields of construction.

Kathleen Lawler, Communication Director of Murchison & Cumming, LLP has been named a Director of the Public Relations Society of America's Los Angeles Chapter (PRSA-LA). Elected to work with local PRSA Student Chapters and the Young Professionals section of PRSA-LA, Ms. Lawler will begin her second term on the PRSA-LA Board of Directors on January 1, 2005.

Ms. Lawler manages all public relations, marketing and client relations activities for the firm. She has been a member of PRSA-LA for four years and served as President of PRSA-LA's Young Professionals Group in 2004. She is also an active member of the Legal Marketing Association.

PRODUCT LIABILITY

Continued from Page 5: TREAD and Consumer Safety Act

II.Reporting Requirements Under The Consumer Product Safety Act

The Consumer Product Safety Act, 15 U.S.C. §§ 2051-2084, initially adopted in 1972, sets forth consumer product safety rules, including product safety standards and warning requirements. The Act established the Consumer Product Safety Commission ("CPSC"), an independent federal regulatory agency with a wide range of powers over consumer products, including authority to adopt and implement product safety standards, ban the sale of unsafe products, and require companies to notify consumers of product hazards

Section 15(b) of the Consumer Product Safety Act, 15 U.S.C. § 2064(b), requires manufacturers, importers, distributors, and retailers of consumer products to notify the CPSC if they obtain information that reasonably supports the conclusion that a product (1) fails to comply with a consumer product safety standard established by the CPSC or a voluntary consumer product safety standard upon which the CPSC has relied under section 9 of the Act; (2) contains a defect which could create a "substantial product hazard"; or (3) creates an unreasonable risk of serious injury or death.

The CPSC has recommended that, at a minimum, a report is required if a jury or court has determined in a product case involving serious injury or death that a product presents an unreasonable risk or is unreasonably dangerous for its intended use. In addition, the Act bans certain hazardous products for use by consumers, including

Continued from Page 5: Proposition 51

In other words, the Fair Responsibility Act preserved the traditional joint and several liability doctrine with respect to a plaintiff's economic damages, but with respect to noneconomic damages adopted a rule of several liability, providing that each defendant is liable for only that portion of the plaintiff's noneconomic damages that is commensurate with that defendant's degree of fault for the injury. 14 Cal Jur 3d (Part 2) § 102 p. 170...

Significant to note, where a manufacturer is sued under a theory of strict products liability and another person or entity is sued for separate acts of negligence and both the defect of the product and the negligent act results in plaintiff's injury -it appears that Proposition 51 is applicable -although no case is directly on point. Proposition 51 applies to actions based upon principles of comparative fault and there is long-standing Supreme Court authority allocating fault between strictly liable and negligent defendants. Arena v. Owens-Corning Fiberglas Corp., 63 Cal.App.4th 1178, 1193 (1998) citing Daly v. General Motors Corp., 20 Cal.3d 725 (1978) and Safeway Stores, Inc. v. Nest-Kart, 21 Cal.3d 322 (1978). Daly court allowed apportionment of fault between a negligent plaintiff and a strictly liable defendant. Safeway court applied comparative fault principles to a strictly liable defendant and a negligent defendant.

M&C COMMUNITY OUTREACH



This fall, Murchison & Cumming, LLP joined more than forty companies, including 17 law firms, participating in Verbum Dei's Corporate Work Study Program. Verbum Dei is an all-boys college preparatory school in Watts. The annual tuition costs are often more than the local residents can afford

and the school faced low enrollment numbers and the possibility of having to close its doors. In 2002, the school started asking local companies to employ its students to help offset tuition costs.

The firm welcomed four students from Verbum Dei who each work one full day a week for the entire school year. The students have the opportunity to gain valuable job experience as they learn how the legal system works.

All four students share the responsibility of one full-time file clerk and the money they earn goes directly to each student's tuition account.

Verbum Dei High School ("Word of God" in Latin) is an allmale, Archdiocesan four-year college preparatory for boys located in the heart of Watts in South Los Angeles.

The school is operated by the Roman Catholic Archdiocese of Los Angeles and managed by the Society of Jesus (Jesuits). It was founded in 1962 by Bishop Joseph Francis of the Society of the Divine Word Missionaries to provide young men from Watts and surrounding areas a quality education. The school offers a comprehensive college preparatory education and is accredited by the Western Association of Schools and Colleges.

Event Calendar

December 14 Lorman Education Series Orange County M&C Speaker: Dan Longo

January 16-18 USLAW Product Liability Seminar Miami, FL M&C Attendee: Bill DelHagen

January 16-18 USLAW Employment & Labor Law Seminar Miami, FL

February 16-18 DRI Product Liability Seminar Los Angeles, CA

March 3-4
Association of Southern California Defense
Counsel (ASCDC) Annual Meeting
Los Angeles, CA
M&C Speaker: Edmund G. Farrell

March 3-4 DRI Toxic Torts and Environmental Law New Orleans, LA

Warch 10-12
USLAW Network Client Conference
New Orleans, LA
M&C Attendee: Russell S. Wollman

March 16 M&C Presents: 2004 Year In Review Los Angeles, CA

March 16 - 18 DRI Medical Liability and Health Care Law San Diego, CA

M&C PRACTICE AREAS

- Business & Technology Transactions
- Business & Intellectual Property Litigation
- Construction Law
- Directors & Officers Liability
- Employment Law
- General Liability & Casualty
- Health Law

Medical Malpractice Long-term Care Facilities & Elder Care

- Insurance Law & Risk Management
- International Law
- Law & Appellate Practice
- Product Liability
- Professional Liability
- Property Insurance & Fraud Investigations
- Toxic Tort & Environmental Law
- Transportation Liability

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LOS ANGELES ♦ ORANGE COUNTY ♦ SAN DIEGO ♦ NORTHERN CALIFORNIA ♦ NEVADA

MARK YOUR CALENDAR!



2004 Year in Review Seminar

March 16, 2005 8:00 a.m. – 12:00 p.m.

Omni Los Angeles Hotel 251 South Olive Street Los Angeles, California 90012

Back by popular demand, Murchison & Cumming, LLP will host its annual Year in Review Seminar on March 16th to discuss major decisions handed down in 2004 from the California Courts of Appeal and the California Supreme Court. The topics discussed will include:

- Civil Procedure
- Employment
- Products Liability
- Insurance Coverage
- Evidence
- Intellectual Property
- Professional Liability
- Bad Faith

For more information about the seminar or to register, please visit our website at www.murchison-cumming.com

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