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 6 Attorneys for Plaintiffs
 3501 WESTERN AVENUE LLC, 5379 WHITTIER
 7 BOULEVARD LLC, and WEST 3RD STREET LLC

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **COUNTY OF LOS ANGELES**

12 3501 WESTERN AVENUE LLC, a Delaware
 limited liability company; 5379 WHITTIER
 13 BOULEVARD LLC, a California limited
 liability company; and WEST 3RD STREET
 14 LLC, a Delaware limited liability company,

15 Plaintiff,

16 v.

18 SPECIAL SERVICE FOR GROUPS, INC., a
 California non-profit corporation doing business
 19 as the HOMELESS OUTREACH PROGRAM
 INTEGRATED CARE SYSTEM; and DOES 1
 20 through 10 inclusive,

21 Defendants.

12 CASE NO. **22STLC07942**

13 **COMPLAINT FOR:**

- 14 **1. BREACH OF CONTACT;**
- 15 **2. COMMON COUNT: ACCOUNT**
- 16 **STATED; AND**
- 17 **3. COMMON COUNT: OPEN BOOK**
- 18 **ACCOUNT**

19 **LIMITED JURISDICTION**

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 24 Plaintiffs 3501 Western Avenue LLC, 5379 Whittier Boulevard LLC, and West 3rd Street
 25 LLC (hereinafter collectively "Plaintiffs"), allege as follows:
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FIFTH CAUSE OF ACTION

(By Plaintiff West 3rd Street LLC For Common Count: Account Stated Against Defendants)

24. Plaintiffs hereby reallege the allegations contained in Paragraphs 1 through 9 and 20 through 23, inclusive, and incorporate them by reference as though fully set forth in full herein.

25. Within the last four (4) years, Defendants became indebted to Plaintiff West 3rd Street LLC because an account was stated in writing between Plaintiff West 3rd Street LLC and Defendants in which it was agreed that Defendants were indebted to Plaintiff West 3rd Street LLC.

26. The sum due to Plaintiff West 3rd Street LLC is \$4,590.00, plus interest at 10% per annum, which is and remains unpaid despite Plaintiff West 3rd Street LLC's demand that Defendants pay this sum.

SIXTH CAUSE OF ACTION

(By West 3rd Street LLC For Common Count: Open Book Account Against Defendants)

27. Plaintiffs hereby realleges the allegations contained in Paragraphs 1 through 9 and 20 through 26, inclusive, and incorporates them by reference as though fully set forth in full herein.

28. Within the last four (4) years, Defendants became indebted to Plaintiff West 3rd Street LLC on an open book account for money due.

29. The sum due to Plaintiff West 3rd Street LLC is \$4,590.00, plus interest at 10% per annum, which is and remains unpaid despite Plaintiff West 3rd Street LLC's demand that Defendants pay this sum.

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SEVENTH CAUSE OF ACTION

(By Plaintiff 5379 Whittier Boulevard LLC For Breach of Contract Against Defendants)

30. Plaintiffs hereby reallege the allegations contained in Paragraphs 1 through 9, inclusive, and incorporate them by reference as though fully set forth herein.

31. SSG breached the agreement with Plaintiff 5379 Whittier Boulevard LLC, by, among other things, failing to pay Plaintiff 5379 Whittier Boulevard LLC all monies due and owing under the agreement.

32. Plaintiff has performed all conditions, covenants, and promises required by it on its part to be performed in accordance with the terms and conditions of the agreement. If Plaintiff 5379 Whittier Boulevard LLC has failed to perform any condition, covenant or promise, said failure is discharged and excused by SSG's failure to meet conditions precedent and necessary for Plaintiff 5379 Whittier Boulevard LLC's performance.

33. As a direct and proximate result of the breach of contract by SSG, Plaintiff 5379 Whittier Boulevard LLC has been damaged in a total amount not yet ascertained but in an amount within the jurisdiction of this Court and believed to be at least \$10,800.00, plus interest.

EIGHTH CAUSE OF ACTION

(By Plaintiff 5379 Whittier Boulevard LLC For Common Count: Account Stated Against Defendants)

34. Plaintiffs hereby reallege the allegations contained in Paragraphs 1 through 9 and 30 through 33, inclusive, and incorporate them by reference as though fully set forth in full herein.

