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CONFORMED COPY
OF ORIGINAL FILED
Los Angeles Superior Court

AUG 29 2014

John A. Clarke, Regentive Circuit Clerk
By GLORIETTA ROBINSON, Deputy

16 SUPERIOR COURT OF THE STATE OF CALIFORNIA
17 LOS ANGELES COUNTY
18 CIVIL -- UNLIMITED

<p>19 SARAH BAUGHN, an individual, 20 21 Plaintiff, 22 23 v. 24 BIKRAM CHOUDHURY, an individual, 25 BIKRAM'S YOGA COLLEGE OF INDIA, 26 L.P., a California Limited Partnership, and 27 DOES 1-25; 28 Defendants.</p>	<p>CASE NO.: BC502424</p> <p>FIRST AMENDED COMPLAINT FOR DAMAGES</p> <ol style="list-style-type: none">1. SEX-BASED DISCRIMINATION IN VIOLATION OF THE UNRUH CIVIL RIGHTS ACT [CALIFORNIA CIVIL CODE § 51]2. SEXUAL HARASSMENT IN VIOLATION OF THE UNRUH CIVIL RIGHTS ACT [CALIFORNIA CIVIL CODE § 51.9]3. VIOLATION OF THE RALPH ACT [CALIFORNIA CIVIL CODE § 51.7]4. INTERFERENCE WITH THE EXERCISE OF CIVIL RIGHTS IN VIOLATION OF THE BANE ACT [CALIFORNIA CIVIL CODE § 52.1]5. GENDER VIOLENCE IN VIOLATION OF CAL CC §52.46. UNFAIR COMPETITION [CALIFORNIA BUSINESS AND PROFESSIONS CODE § 17200 ET SEQ.]7. TORTIOUS INTERFERENCE WITH
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	BUSINESS RELATIONSHIPS 8. CIVIL CONSPIRACY 9. DEFAMATION [CALIFORNIA CIVIL CODE § 44] 10. INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS 11. NEGLIGENT INFLECTION OF EMOTIONAL DISTRESS 12. NEGLIGENCE 13. NEGLIGENT SUPERVISION AND HIRING 14. UNLAWFUL NON-COMPETE AGREEMENT [BUSINESS AND PROFESSIONS CODE § 16600 ET SEQ.] 15. CLAIM FOR DECLARATORY AND INJUNCTIVE RELIEF REQUEST FOR JURY TRIAL AMOUNT IN CONTROVERSY EXCEEDS \$25,000
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Plaintiff SARAH BAUGHN complains against Defendants BIKRAM CHOUDHURY, BIKRAM'S YOGA COLLEGE OF INDIA, L.P., and DOES 1-25as follows.

NATURE OF THE ACTION

1. This is a sex-based discrimination and sexual harassment case where Plaintiff is being discriminated against as a woman, because she did not and will not submit to Defendant Bikram Choudhury's repeated demands for sex, and because she successfully fought him off when he sexually assaulted her. As a result, Plaintiff was and continue to be punished and threatened, including with implicit economic reprisals if she were to discuss or report the sexual assault, and was not permitted to reach the highest levels of her profession.

2. To this very day, Defendant Bikram Choudhury and others have engaged in a campaign of civil conspiracy, unfair competition, and tortious interference that began when Plaintiff was denied her rightful, judge-determined title as International Champion in 2008 because she refused Mr. Choudhury's demand to have sex with him. This conspiracy continues to the present when she has been prevented from teaching seminars or advanced classes because of her past and

1 continuing refusal to have sex with her guru. Other people who have either submitted to Mr.
2 Choudhury's sexual advances or provided him with women for sex have been permitted to teach
3 such classes.

4 3. As a direct consequence of these unlawful acts, Plaintiff has suffered
5 defamation, economic, consequential, and other damages, all to her detriment. Defendants' actions
6 forced Plaintiff to hire attorneys and file suit and she, therefore, has incurred substantial attorneys'
7 fees and costs.

8 **PARTIES**

9 4. Plaintiff SARAH BAUGHN (hereinafter, "Sarah," "Sarah Baughn" or
10 "Plaintiff") was a resident of San Francisco, California in the County of San Francisco or Vista,
11 California in the County of San Diego at all times material to this complaint. Sarah Baughn is a
12 young woman who is fully qualified and certified by Defendants Bikram Choudhury (hereinafter,
13 "Choudhury" or "Defendant Choudhury") and Bikram's Yoga College of India, L.P. (hereinafter,
14 "Yoga College.") to teach "Bikram Yoga" which is a type of Hatha Yoga practiced in rooms heated
15 to 105 degrees Fahrenheit.

16 5. Defendant Bikram's Yoga College of India, L.P. is a California Limited
17 Partnership (California Secretary of State No. 200223100010) and operating in the City and County
18 of Los Angeles at all times material to this first amended complaint.

19 6. Defendant Bikram Choudhury is a resident of Los Angeles county and owns,
20 operates and controls Bikram's Yoga College of India, L.P. is a California Limited Partnership and
21 other business entities currently unknown to Plaintiff and sued herein as Does 1- 25.

22 7. Plaintiff is informed and believed that Defendant Bikram Choudhury treats
23 Defendant Bikram's Yoga College of India, L.P and his other partnerships, businesses and
24 corporations as his "alter ego" rather than as separate entities, and that upholding these partnerships,
25 corporations or business entities to stand separate and allowing Defendant Bikram Choudhury to
26 escape personal liability for its actions would sanction a fraud or promote an injustice.

27 8. The true names and capacities, whether individual, corporate, associate or
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1 otherwise, of Defendants Does 1 through 50, are unknown to Plaintiff, who therefore sues said
2 Defendants by such fictitious names. Plaintiff will amend this Complaint by inserting the true names
3 and capacities of each such Defendant, with appropriate charging allegations, when they are
4 ascertained. Plaintiff is informed and believes and thereon alleges that each of the Defendants
5 designated herein as a “Doe” is responsible in some manner for the injuries suffered by Plaintiff and
6 for damages proximately caused by the conduct of each such Defendant as herein alleged.

7 9. Plaintiff is informed and believes and thereon alleges that at all times material
8 to this Complaint, Defendant and each of the defendants fictitiously named in this Complaint, in
9 addition to acting for himself, herself or itself, and on his, her or its own behalf individually, is and
10 was acting as the agent, servant, employee and representative of, and with the knowledge, consent
11 and permission of, and in conspiracy with each and all of the defendants and within the course,
12 scope and authority of that agency, service, employment, representation and conspiracy. Plaintiff
13 further alleges on information and belief that the acts of each of the defendants were fully ratified by
14 each and all of the defendants. Specifically, and without limitation, Plaintiff alleges on information
15 and belief that the actions, failures to act, breaches, conspiracy and misrepresentations alleged herein
16 and attributed to one or more of the specific defendants were approved, ratified and done with the
17 cooperation and knowledge of each and all of the defendants.

18 10. The allegations of this Complaint stated on information and belief are likely
19 to have evidentiary support after a reasonable opportunity for further investigation and discovery.

20 VENUE

21 11. Venue is proper because Defendant Yoga College is a limited partnership
22 that is doing business, or has done business during the times related herein, in the City and County
23 of Los Angeles.

24 12. Defendant Bikram Choudhury, individually and as a managing agent of
25 Defendant Yoga College, committed acts causing harm to Plaintiff primarily in the State of
26 California.

27 CONTINUING VIOLATIONS

1 amended complaint relates back if it rests on the "same general set of facts" as alleged in the original
2 complaint.

3 **FACTUAL DISCUSSION**

4 **FACTUAL DISCUSSION RE CLAIMS OF SARAH BAUGHN**

5 **A. SARAH BAUGHN BEGINS PRACTICING BIKRAM YOGA**

6 17. In October of 2004, Sarah Baughn was a sophomore in college studying
7 creative writing. She was athletic and ran on a daily basis, even entering three and five kilometer
8 races. Because of her athleticism, a friend of her boyfriend invited her to a Bikram Yoga class,
9 warning her that the class would be very challenging as the yoga would be performed in a room that
10 was very hot and that the class would be very long.

11 18. On October 19, 2004, Sarah took her first yoga class. The class was indeed
12 challenging and exhausting, but she also found it exhilarating. She continued to attend Bikram
13 classes regularly, sometimes once or twice a day.

14 19. Even early on, Sarah's instructors began commenting on how promising she
15 was and how quickly her practice improved. An early instructor told her that if she kept it up, she
16 would be "on the cover of Yoga Journal Magazine." Sarah found that the practice of yoga was
17 challenging, inspiring, and it greatly added to her happiness. She believed that she had found her
18 calling—to introduce other people to the peace, well being, and health benefits of Bikram Yoga by
19 becoming a certified Bikram teacher.

20 20. Sarah continued to excel at an astonishing rate. Five months after her very
21 first Bikram class, Sarah took the plunge. At the young age of 20, she dropped out of college and
22 took out loans to attend Bikram's Yoga Teacher Training, an apprenticeship program by which
23 students learned to become certified Bikram Yoga instructors. Sarah Baughn was below the stated
24 minimum age of 21 required to take the course, but she wrote an extensive essay discussing how
25 yoga had changed her life, and was admitted despite her youth.

1 21. Sarah Baughn paid Bikram Choudhury in excess of \$7,500 to attend the
2 grueling nine-week teacher training course, and traveled to Los Angeles to begin her instruction and
3 apprenticeship.

4 **B. SARAH BAUGHN ATTENDS TEACHER TRAINING**

5 22. In the spring of 2005, Sarah Baughn began the teacher training course. She
6 was welcomed to the training, along with 300 other students, by Bikram Choudhury himself, his
7 wife, Rajashree Choudhury, his daughter, Laju Choudhury, C.V. who was the director of teacher
8 training, and E.C., a senior teacher, among others.

9 23. The very first night of class, which Bikram Choudhury himself taught, Sarah
10 Baughn was elated to begin her training with a man who she believed had changed her life and who
11 she thought of as a hero. She did her best to perfect her practice so that her guru, who she believed
12 at the time to be a genius, would notice her dedication to the yoga that he taught.

13 24. Very early in training, Sarah Baughn noticed that Bikram Choudhury's
14 relationship with young women yoga students was different. Some of the young women were
15 chosen to brush his hair and massage his body. At that time, Sarah assumed that these acts were
16 innocent, a result of cultural differences, or simply the actions of overenthusiastic young women.
17 One of the women who brushed his hair and massaged his body was M., who subsequently became
18 an international champion.

19 25. On the third night of training, Sarah noticed her guru (Defendant Bikram
20 Choudhury) staring at her when he was supposed to be commenting on the postures of his students.
21 Then, she saw him remove his diamond-studded Rolex from his wrist, hand it to the young woman
22 brushing his hair, M., and whisper something in her ear. Choudhury then watched as M. walked
23 straight up to Sarah Baughn and gave her the watch. Although she felt uncomfortable with the
24 dramatic gesture, Sarah Baughn greatly admired her guru, and in return, gave M. her wristwatch to
25 give to Choudhury.

26 26. After Choudhury and Sarah Baughn had switched their watches back, Sarah
27 waited in line to speak with him about her local yoga studio. When he reached her in line,
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1 Choudhury skipped over her, and when the person standing behind her in line remarked that Sarah
2 had been there first, Choudhury stated, “she can wait.”

3 27. Bikram Choudhury took pictures with various students and spoke with each
4 and every other student before addressing Sarah. He turned to her, looked at her and put his hand
5 on her arm. In an attempt to maintain professionalism and to break the odd intrusion of her
6 personal space, Sarah joked about the wristwatches and brought up her question about her home
7 studio. Choudhury ignored the question, and then the conversation took a bizarre turn.

8 28. Choudhury insisted that he and Sarah knew each other before—in a past life.
9 He insisted that their past-life connection was so strong and meaningful that he still remembered it.
10 While she wished to show respect for his religious beliefs, this conversation made Sarah
11 uncomfortable, and she made excuses to leave. When she said goodbye, Choudhury kissed her
12 cheek and told her that they would talk again soon.

13 29. The next day, Sarah took her turn in demonstrating the Half Moon dialogue
14 for Bikram Choudhury and all of the rest of the trainees. After she finished, Bikram Choudhury
15 proclaimed to the class that her performance was “perfect,” that he had trained her personally and
16 taught her everything she knew, and that she was his “assistant.” He took to calling her, “Sada, my
17 assistant.” He constantly praised the excellence of her practice, including in public, in front of the
18 other students. Sarah was both pleased and disconcerted by the fact he picked her as a favorite, and
19 unsure about what to say regarding his fabrication that he had previously taught her, so she said
20 nothing.

21 30. On Friday, the fifth day of training, Defendant Bikram Choudhury asked
22 Plaintiff Sarah Baughn to come into his office. Sarah knew that the instructor of her class, J.W., was
23 a stickler for tardiness, but also knew that Choudhury’s authority surpassed everyone else’s at
24 teacher training. Sarah had no idea what Choudhury would say or do, and his next words were
25 shocking to her.

26 31. Choudhury said: “What should we do about this?” Before she could ask
27 what he meant, he spoke again. “Should we make this a relationship? I know you from a past life,
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1 and I have this feeling about you. In your culture, you call it love; I can't love, you know that," (he
2 had lectured on his beliefs on love and marriage the night before) "but that is how I feel about you.
3 Hard to describe. I have never, NEVER felt like this about ANYONE. Only you. Who are you? I
4 know you. I know you from a past life. We have a connection. It is amazing. So what should we do
5 about this?"

6 32. Sarah Baughn found herself completely frozen and mortified by Defendant
7 Bikram Choudhury's words. She understood the remarks to be a proposition, based on their tone,
8 and based on Choudhury's earlier speech about love and marriage. To her, Yoga was her life's
9 major accomplishment and her calling. She now felt that this man who she had believed was
10 brilliant and holy and trustworthy might take her accomplishment away from her. She had never
11 thought that he would proposition a 20-year-old student, barely older than his own daughter. Sarah
12 knew at that moment that her certification was at risk—because Bikram Choudhury alone had the
13 power to determine whether she would be certified after eight more intensive weeks of training.

14 33. Sarah finally found her voice, and began objecting, explaining that she had a
15 boyfriend. Choudhury's response was to say, "I have a wife," by way of dismissing her concern.
16 She continued her protest for five minutes, and then excused herself to class, stating that she was
17 already tardy. Choudhury dismissed her, saying: "Yes, yes... you go. We will talk about this later. I
18 will call you this weekend, and you can come to the movies with me and my son in Santa Monica."

19 34. Sarah burst into tears as soon as she left the office. She was distraught and
20 did not know what to do. Choudhury's proposition caused her extreme emotional distress. She also
21 did not wish to give up Yoga, which had given her life so much meaning, nor did she think she
22 could leave, based on the money she had paid and the loans she had taken out to attend teacher
23 training.

24 35. Finally, after speaking with her boyfriend, Sarah summoned up the courage
25 to report the harassment the very next day to C.V., the head of teacher training, who had previously
26 chewed her out when she was late to class. She was distraught by Choudhury's propositions. When
27 Sarah tried to speak, because could barely do so because she was so upset. C.V. berated her for her
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1 stammering. Sarah Baugh she finally spoke up and revealed Defendant Bikram Choudhury's
2 proposing that they enter into an affair. C.V. became very upset, and demonstrated his knowledge
3 Defendant Bikram Choudhury's mistreatment of woman. C.V. told Plaintiff Sarah Baugh that he
4 hoped she would stay with the program, because although Defendant Bikram Choudhury was "not
5 a good man" he was a "good teacher." Sarah received for the first time the advice she would hear
6 over and over, that she should "separate the man from the teacher" a mantra that various Yoga
7 College employees and volunteers repeated to her over the years by way of excusing Bikram
8 Choudhury's terrible behavior. C.V. simply instructed Sarah to tell Defendant Bikram Choudhury to
9 stop; that if she did so, Choudhury would be respectful and would stop pursuing her. C.V. also told
10 Sarah not to tell Choudhury's wife.

11 36. Thereafter, Sarah could barely look Defendant Bikram Choudhury in the eye,
12 but he continued to distinguish her with his attention. Still, Defendant Bikram Choudhury called
13 her "Sada" his "assistant" and asked to demonstrate flexibility postures, which she particularly
14 excelled at. Defendant Bikram Choudhury would then instruct Sarah to kiss him in front of the
15 class, which she always declined to do. Many times, Defendant Bikram Choudhury would ask for
16 Sarah when he entered a crowded room, and she would hide behind other students.

17 37. One night, Defendant Bikram Choudhury delivered another one of his
18 rambling and outrageous lectures on relationships and religion, which the students were forced to
19 attend. He would make stereotyped statements about men and women. He described men as a
20 mixture of "a dog, a pig, and a goat," and used this comparison to excuse aggressive and sexist
21 behavior.

22 38. In the middle of this lecture, Choudhury told the crowd that he was
23 communicating with his guru, Bishnu Charan Ghosh, who was floating above his head. He stated
24 that the guru told him that he (Defendant Bikram Choudhury) could do no wrong. He opened his
25 eyes and looked straight at Sarah, in a room of 300 people.

26 39. Days later, Defendant Bikram Choudhury accosted Sarah in class. While
27 pretending to assist her, he pushed her down towards the floor after pulling her arm and leg apart
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1 and opening her body. Defendant Bikram Choudhury then pressed his body into hers, and began
2 whispering sexual things to her until she collapsed into sobs, which other students interpreted as
3 weakness, not knowing that Sarah was being harassed. Her tears did not prevent Choudhury from
4 continuing to demand sex and affection from her in whispers.

5 40. After class, the instructor, C.V. praised her for her “strength” and told her
6 she had done a good job in resisting Choudhury’s advances.

7 41. Sarah did not know what to do. She turned to her boyfriend and the owners
8 of the studio where she began training for help. Her boyfriend began making a show of devotion,
9 by sending her cards and visiting. The head of her studio said that she would confront Bikram
10 Choudhury, describing his behavior to Sarah’s mother as “bad” but opining that he was ultimately
11 “harmless.”

12 42. After the studio owner confronted Defendant Bikram Choudhury, he
13 became vindictive. Although the unwanted attention was withdrawn, Defendant Bikram Choudhury
14 treated her like a pariah. Defendant Bikram Choudhury went from speaking to Sarah almost every
15 class to ignoring her completely. She felt demoralized and humiliated. He would also look down at
16 her from the podium where he was teaching, and shoot her nasty and disapproving looks while
17 loudly instructing other students. Defendant Bikram Choudhury made it obvious to everyone that
18 that he was not speaking to Sarah.

19 43. Defendant Bikram Choudhury also made a strange phone call to Sarah’s
20 boyfriend who was also a certified Bikram instructor, and made a vague non-apology, stating that
21 “things happen” and he hoped her boyfriend would not be unhappy.

22 44. Defendant Bikram Choudhury continued to freeze out Sarah Baughn until
23 the night of his wife Rajashree’s fortieth birthday party. That night, after Sarah said hello to him,
24 Choudhury took her away from the other partygoers, and made it clear that he was ignoring Sarah to
25 punish her for refusing to carry on a relationship with him and telling others about his behavior.

26 45. After this confrontation, Choudhury started calling on Sarah to demonstrate
27 again. One day, he demanded that she brush his hair. She declined, in front of a room full of
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1 people, and handed the brush to one of the young women who did brush his hair. Choudhury
2 instructed the other young woman to give the brush back to Sarah, and he did not back down until
3 she agreed to brush his hair.

4 46. When assisting Sarah with a yoga posture that had caused her some difficulty,
5 Choudhury pulled on her top leg so hard that Sarah re-tore her hamstring. This is despite the fact
6 that Bikram Choudhury himself had made a rule that teachers should never touch or pull on
7 students' bodies. Sarah also complained of a pain in her ribs, and was viciously mocked by
8 Choudhury in front of the class. She subsequently tore her intercostal muscle in her ribcage by
9 doing a single sit-up, an injury that immobilized her and caused her tremendous pain.

10 47. Choudhury also endangered his students in other ways, for example, by
11 preaching that there was no such thing as hyperextension. As a result, Sarah suffered such severe
12 knee pain that she was misdiagnosed with a torn meniscus, for which she eventually received
13 surgery.

14 48. Choudhury continued to pursue Sarah and make declarations of love during
15 teacher training, including by saying that he would never love anyone like he loved her, and that she
16 was the only person he would dream of pursuing other than his wife.

17 49. Despite these injuries and the non-stop harassment, Sarah successfully
18 completed teacher training, and even performed front and center in a yoga demonstration, an honor
19 that was bestowed on her by Rajashree Choudhury. Because of her two injuries, she took large
20 quantities of medication in order to be able to tolerate the pain and perform.

21 **C. SARAH BEGINS ENTERING YOGA COMPETITIONS**

22 50. Although Sarah Baughn initially thought that competitive yoga was a
23 contradiction in terms, during teacher training, a visiting teacher M.H. encouraged students to
24 compete. Sarah thought competition could be used to introduce more people her age to yoga.

25 51. Within a few short months after teacher training, Sarah entered and placed
26 first in the Washington State Regional Yoga Competition. This was the first of many competitive
27 Yoga titles she won.

1 52. A scant year and three months after beginning her practice, Sarah Baughn
2 rose to international prominence. At the behest of a yoga studio owner who hired her, L.W., Sarah
3 began training for Nationals. She admired many of the other competitors, and in her modesty, did
4 not believe that she had the skills to challenge these women who she looked up to.

5 53. To Sarah's surprise, she tied for second place in Nationals in 2006. She was
6 thrilled. The very next night, she competed in Internationals, and again placed second. She took the
7 Bikram yoga world by storm, by taking second place after being almost completely unknown. Her
8 rise was meteoric and a testament to her exceptional abilities, discipline, and focus, despite her
9 young age.

10 54. Shortly after these victories, Sarah Baughn's knee pain worsened and became
11 unbearable, and she received surgery for what her doctor misdiagnosed as a torn meniscus, and what
12 Sarah eventually learned from the orthopedic surgeon and on-site physical therapist that the knee
13 injury was in fact caused by hyperextension.

14 55. L.W. eventually learned of Sarah Baughn's sexual harassment at the hands of
15 Choudhury. Like every other member of the yoga community, L.W.'s reaction was shock followed
16 by a string of excuses for Bikram Choudhury's behavior.

17 56. When Sarah's allegations of mistreatment came to light, the response from
18 people who worked for the Yoga College or who owned Bikram Yoga Studios was predictably and
19 depressingly the same. The only thing Sarah ever heard from anyone she confided in was "Oh that's
20 terrible, BUT.... You know how he is?" or "...BUT his whole life he's been taught that he only
21 deserves the best, so of course he is going to try to be with the pretty, flexible girls," or "...BUT you
22 have to separate the man from the teacher," or "...BUT he's innocent, you know, like a child," etc.,
23 etc.

24 57. In 2007, Sarah again competed in regionals and nationals, this time, without a
25 coach. She tied for first place in regionals, and did not place at nationals because she put her foot
26 down during a posture.

1 58. After Nationals, Sarah's next contact with Bikram Choudhury was when he
2 visited the studio she taught at in San Francisco in 2007 to teach a seminar with Rajashree. It was
3 the last class they ever taught together, to Sarah's knowledge. At the end of the class, Sarah was
4 once again called to the front of the class to demonstrate yoga postures.

5 59. At the time of the seminar, rumors were spreading that Choudhury was
6 having an affair with a woman named K., and that his brother had told his wife. Sarah thought that
7 this new alleged love interest meant that Choudhury would no longer pursue her.

8 60. Choudhury nevertheless managed to find Sarah alone, and asked about her
9 boyfriend. He displayed disbelief followed by great interest when he learned that the relationship
10 with her boyfriend was over. Sarah remembers that he smiled when she confirmed the relationship
11 was over.

12 61. In addition to the beginning class of 26 postures that Sarah was certified to
13 teach, she and other Bikram teachers were initially permitted to perform, but not teach, the
14 advanced class, which was made up of 84 postures. Sarah often led the advanced class, as she knew
15 the postures by heart.

16 62. During one advanced class, when Sarah learned that a young and beautiful
17 student, J., was about to attend teacher training, Sarah warned her of what Defendant Bikram
18 Choudhury might try to do (e.g., sexual propositioning and touching) and then Plaintiff Sarah
19 Baughn told her own story (about what Defendant Bikram Choudhury had done to her) to everyone
20 in the class.

21 63. When visiting the next teacher training, it became clear that Sarah's warning
22 had reached the ears of people working at the Yoga College. C.V., the very person Sarah had
23 confided in about the harassment during teacher training, approached her and warned her, stating
24 that he knew what she said during the advanced class, and he communicated to her that continuing
25 to speak about Bikram Choudhury's abuse would be a huge mistake.

26 64. Despite these setbacks and threats, Sarah remained resilient and eager to
27 compete. She approached Jim Kallett, who was Bikram Choudhury's best friend, and asked that he
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1 coach her. Sarah Baughn moved to Vista, California in order to train with him in San Diego, where
2 she flourished under his tutelage, and greatly admired him as a coach.

3 65. During this time, at Jim Kallett's suggestion, Sarah also would drive up to
4 Los Angeles to receive instruction in physical postures from E.C. and Bikram Choudhury himself.

5 66. Although Bikram Choudhury started taking a special interest in Sarah again,
6 she believed that this time it was innocent. His behavior was appropriate and encouraging and she
7 naively thought he seemed genuinely interested in Sarah's progress.

8 67. Unfortunately, this relief did not last long. She met a former champion, L.,
9 who alleged that Bikram Choudhury had also pressured her for sex, enraging her husband so much
10 that he went from being a yoga instructor himself to eventually giving up yoga altogether. Despite
11 the fact that L. was an excellent instructor who was invited to teach at all of the trainings, worked
12 with Choudhury and C.W. in Japan, and teaches for Jim Kallett in San Diego, she was never put on
13 the list of instructors permitted to teach seminars. On information and belief, other women who
14 were alleged to have slept with Choudhury were included on that list, as were people who allegedly
15 procured him women to sleep with, or people who helped him arrange meetings with his alleged
16 mistress, K. Choudhury's wife, Rajashree, instructed at least one person, C.W., to keep K away from
17 Choudhury, make sure she received no special treatment, and to spy on K for Rajashree.

18 68. Sarah Baughn attended a teacher training in Hawaii to assist in teaching the
19 new trainees. Bikram Choudhury paid for her accommodations. In the evenings, he constantly
20 sought her company, but for her part, Sarah kept him at arm's length, and was never alone with him.

21 69. Because Sarah was far from home when she lived in Vista, California,
22 Defendant Rajashree Choudhury invited her to the Choudhurys' home for Thanksgiving. Sarah
23 repaid the thoughtfulness of her hostess by arriving early and assisting in the kitchen for hours.
24 That evening, Bikram Choudhury treated her like any other guest.

25 70. Sarah was beginning to feel like any other member of Choudhury's inner
26 circle. She believed Defendant Bikram Choudhury now respected her for her abilities, and saw her
27 as a promising protégé and would stop his inappropriate conduct.

1 71. Sadly, she was mistaken. When the other guests had left, and Defendant
2 Rajashree Choudhury had gone to bed, Defendant Bikram Choudhury once again began to harass
3 Sarah Baughn.

4 72. Sarah asked for an honest evaluation of her ability to win Internationals, and
5 Bikram Choudhury responded by placing a hand on her leg, lying down and whispering sexual
6 demands in her ear. He then embraced her from behind, and pressed his penis into her leg. Sarah
7 was shocked, and froze.

8 73. Defendant Bikram Choudhury said, “I am so lonely. I need someone to
9 spend time with me. To give me massages. To talk to me. To love me. To.... To.... have sex with
10 me,” to which Sarah eventually had the presence of mind to reply with “What about your WIFE?”
11 Defendant Bikram Choudhury replied, “She is terrible to me. She is so mean, you have no idea.”

12 74. Still at a loss, Sarah responded “What about your GIRLFRIEND then?”
13 Defendant Bikram Choudhury seemed surprised that Sarah knew about his girlfriend. “[K]? She is
14 different... I don’t love her... she is just to have sex with me...I need someone to love me and
15 spend time with me. I am so lonely. I am dying. I can feel myself dying. I will not be alive if
16 someone doesn’t save me. My body is breaking down. I am always hurting. I need someone to take
17 care of me so I don’t die.” Sarah replied, “Why don’t you just do your yoga? That will fix you—at
18 least that’s what you tell us.” Choudhury responded, “It won’t work anymore. I need you.”

19 75. “‘What about [K], can’t she fix it? Can’t she be with you and keep you alive?’”
20 Sarah asked, trying to reason her hero out of pursuing her. “No. She isn’t like you. She is different.”
21 “‘What does your wife think about her?’” Sarah asked. Defendant Bikram Choudhury replied, “My
22 wife is such a bitch, you have no idea. She is the reason I am dying. You have to save me.”

23 76. Sarah tried another tack to disengage. Sarah told Defendant Bikram
24 Choudhury “I have too much respect for you as my teacher. I have too much respect your wife...
25 and I have too much respect for myself.” In an effort to fully control and seduce Sarah, Defendant
26 Bikram Choudhury said, “I can make you a champion. It is the only way.”

1 77. Sarah became incensed and pushed him off of her and responded, “I can do
2 it on my own!” Defendant Bikram Choudhury threatened, “No you can’t!” Sarah asked, “You are
3 saying: the only way I will be a champion is if I sleep with you?” “Yes. That is the only way.”

4 78. Sarah then decided to leave. “No. I am going to do it on my own. You will
5 see.” “No. You won’t!” As Sarah tried to escape, Defendant Bikram Choudhury yelled, “You will
6 never be champion without me!”

7 79. Sarah came to understand that once again she was being threatened—the
8 only way for her to obtain the professional success he worked so hard for was for her to submit
9 sexually to her guru -- which she utterly refused to do.

10 80. Sarah confided in her coach, Jim Kallett, who initially agreed that Defendant
11 Bikram Choudhury should not have behaved as he did, but tried to cover for Defendant Bikram
12 Choudhury saying that Choudhury had acted as he did to “motivate” Sarah.

13 81. Sarah competed at the 2008 Nationals, and tied for first place, her best
14 showing to date.

15 82. After her first place victory, she approached Defendant Bikram Choudhury
16 to see if he was pleased with her success. When she mentioned a hip injury, he leered at her and
17 offered to “open her hips.” Choudhury then began to critique her performance in crudely sexual
18 terms, and repeatedly hinted that she should join him in his room, and that if she did so, victory at
19 Internationals was assured. Sarah repeatedly steered the conversation back to appropriate topics.
20 During the conversation, Choudhury also claimed that she and all of the women competitors, save
21 one, had done a certain posture incorrectly. He told her that M., the young woman who had
22 frequently massaged Choudhury and brushed his hair during Sarah’s teacher training, had performed
23 the posture properly. Sarah pointed out that M. had not, and noticed that Choudhury had drawn a
24 star next to M.’s picture in the program.

25 83. The next day, Sarah competed in Internationals, and performed her routine
26 to near perfection. The applause was thunderous, and Sarah, her coach, and the audience all knew
27 that she had delivered a stunning performance. Sarah should have been the hands-down winner!

1 Sarah and her coach had assumed that Sarah had won because her performance was exemplary and
2 because M., who was Sarah's biggest competition, had stumbled during her standing head to knee
3 pose, which should have disqualified her from the competition.

4 84. Shockingly, the first place title did not go to Sarah, but to M., despite her
5 stumble. Even the judges looked stunned.

6 85. M. began receiving preferential treatment after she was named the champion
7 at Internationals. She taught at teacher training in Acapulco three times, despite the fact that most
8 visiting teachers are fortunate if they get to teach the course in Acapulco once. When she was
9 visiting Acapulco, M. also stayed in Defendant Bikram Choudhury's room with him.

10 86. Sarah Baughn suffered severe emotional distress as a result of this
11 devastating and undeserved loss.

12 87. That very day, one of the judges, L.W., approached Sarah and implied that
13 Defendant Bikram Choudhury had rigged the outcome of the contest; that the judges had all
14 awarded Sarah first place. The judge's words were: "You were f---ing robbed. That's not what we
15 wrote down. We had you as first." Sarah was shattered.

16 88. Others expressed their sympathy at Sarah's "loss" including Defendant
17 Rajashree Choudhury and an instructor named M.W. who offered her his guesthouse and said that
18 Sarah "carried herself like a champion."

19 89. Sarah confided in a former international champion, E.G., about the
20 circumstances surrounding her "loss" of the title. Once again, like everyone else in the Yoga College
21 organization that she confided in, he blamed Sarah instead of the guru for the loss, stating that she
22 must have lost because on some level she wanted to.

23 90. Had Sarah not been cheated out of the title by a conspiracy between Bikram
24 Choudhury, the judges, and other members of Yoga College, she would have been able to travel for
25 free for a year and would have been fully booked to demonstrate and teach at Bikram studios all
26 over the world. This lost opportunity cost her thousands of dollars in that year alone, including a
27
28

1 \$40,000 donation to a charity of her choice that was deeply important to her, as well as the future
2 opportunities she would have obtained as International Champion.

3 91. This corruption and retaliation completely destroyed her trust and respect for
4 her guru, her hero, the man she had once thought was a genius.

5 92. Sarah later learned, to her dismay, that two female champions had allegedly
6 slept with Defendant Bikram Choudhury before being awarded their titles. Another former
7 champion was first granted and then, two days later, capriciously denied, the right to lead seminars
8 after she allegedly refused to massage Defendant Bikram Choudhury's left testicle.

9 93. Sarah Baughn was warned by her coach, Defendant Bikram Choudhury's
10 best friend, not to speak about the circumstances surrounding her "loss" any more after he learned
11 she had been confiding in others.

12 94. On a personal level, the wrongful denial of the title bothered Sarah because if
13 she had won, she would have been able to donate \$40,000 to a charity of her choice. In the months
14 after the competition, Sarah decided to take matters into her own hands. She self-funded a multi-
15 city tour, and donated the proceeds of her classes to charity, ultimately raising \$7,000. She did not
16 use any of the money to pay for her travel and accommodations, and donated the entire sum.

17 95. Sarah Baughn continued to practice at an exemplary level. During her tour,
18 she met Benjamin Lorr, who subsequently wrote a book about his experience with yoga, called *Hell*
19 *Bent*. Lorr praised Sarah's abilities, writing:

20 Sarah might do something as simple as sit on her mat, lean forward
21 and touch her toes - a hammy stretch from soccer practice - but
22 somehow make it totally consuming. She had a concentration that
23 expanded into her entire body. In many ways, it felt like I was
24 watching a waterfall: the same roaring power, the same glassy beauty,
25 with my brain achieving the same hum in its presence. It wasn't
26 difficulty or aesthetics. Most of her postures were the stuff b-list ice
27 skaters would scorn on those terms. It was as if I was watching Sarah
28 perfect herself. Or I was watching a more perfect Sarah. As she
poured herself from posture to posture, this woman, standing on a
towel on a mat in a slightly stinky room, took on a dimension I had
previously only associated with natural phenomena, the stuff of Sierra
Club calendars: rockwalls and ice chasms, somehow distilled into the
body of a twenty-one-year-old.

(Lorr, *Hell Bent*, (2012) pp. 20-21.)

1 **D. SARAH JOINS THE STAFF OF THE ACAPULCO TRAINING**

2 96. By spring of 2008, following her self-funded charity tour, Sarah accepted an
3 unpaid staff position at the Acapulco teacher training. Despite her irreparable rift with Choudhury,
4 she wished to teach and inspire the next crop of yoga instructors.

5 97. After meeting with the senior staff members, Sarah Baughn insisted that she
6 never be left alone with Bikram Choudhury. The staff members agreed.

7 98. C.V. was present, and frequently called on Sarah to demonstrate during class,
8 in recognition of her excellence and the fact that the title of champion was rightly hers.

9 99. Choudhury required his hard-working staff to stay up late with him, watching
10 movies in his room, which they all hated, and would do in shifts. Those who did not show up were
11 publicly ridiculed the following day with profanity.

12 100. One night, during the movies, Sarah and other staff members fell asleep. At
13 3 a.m., she was rudely awakened by a member of staff, who hurried out of the room before Sarah
14 could find her shoes, despite his promise to never leave her alone with Choudhury.

15 101. The moment the door closed behind this staff member, Sarah rushed toward
16 the door with her shoes in her hand, at which point Choudhury attacked her, pinned her against the
17 door, and sexually assaulted her by kissing her neck, chest, and face, and grinding his penis against
18 her leg. Sarah immediately said, “What are you doing? Stop this. I don’t want to do this.”
19 Choudhury continued his assault, putting his hands all over her body, while she unsuccessfully tried
20 to push him off of her. Finally, she managed to open the door and escape.

21 102. Sarah was in shock. Although some of her fellow staff members were deeply
22 sympathetic, the man who left her alone with Choudhury actually provided her with “feedback” and
23 claimed that Sarah was “asking for it.”

24 103. Sarah was trapped in a foreign country, and had to rely upon her abuser for
25 the money to return home after the attack. As a result, she stayed for the remainder of the training,
26 while suffering severe emotional distress.

1 104. After she became ill with the flu, and missed two days of movie nights,
2 Bikram Choudhury berated her once again, saying:

3 “Where the fuck have you been?”

4 “I was really sick.”

5 “Fuck you. You are just lazy. I am all alone in the movies and you don’t even come
6 down?”

7 “I was throwing up...” She protested.

8 Defendant Bikram Choudhury cut off her explanation and walked away swearing.

9 **E. SARAH CONTINUES TEACHING AFTER THE ASSAULT**

10 105. Sarah returned home, and still suffering from emotional distress, moved up
11 to the San Francisco bay area to replenish her bank account and to heal from the trauma she had
12 suffered.

13 106. Sarah began to become interested in leading seminars, which was
14 commensurate with her prodigious abilities. But she was never added to the seminar leader list.
15 Initially, Choudhury and E.C. approved her to lead the advanced yoga class, but she was not
16 permitted to teach the class. Eventually, Choudhury decreed that no one could lead the advanced
17 class without paying him a significant sum of money to attend his advanced Seminar.

18 107. Over time, Sarah learned that people on the seminar leader list included
19 women who had allegedly slept with Choudhury, men who had allegedly provided Choudhury with
20 young women to sleep with, and the man who had abandoned her in Choudhury’s room to be
21 attacked, among others.

22 108. Defendant Bikram Choudhury relentlessly continued to invite Sarah to his
23 room. By this time, she had a small daughter who she brought with her, and she took pains never to
24 be alone with him.

25 109. Sarah Baughn began to be in high demand as a teacher, a coach, a judge, and
26 was often asked to teach intensive classes or speak with students around the country.

1 110. Frequently, students drive from San Jose to San Francisco to take Sarah's
2 classes. Other students and fellow teachers have traveled from far away locations, including Texas,
3 Illinois, Minnesota, and Calgary, to take Sarah's class. Some have travelled internationally to take
4 classes from her. Experienced yoga instructors defer to corrections she has given students,
5 particularly regarding posture, including C.V. One student even relocated from the Midwest to
6 California to study under Sarah, and other students have moved to be taught or coached by Sarah.
7 She is a deeply inspirational and highly gifted teacher, and is beloved by her students, and admired
8 tremendously by fellow teachers, despite her young age.

9 111. As a coach, she trained Brandy Lyn Winfield, who eventually won
10 Internationals, and praised Sarah as her coach every time she was asked to speak. She also trained
11 Cristine Roberts, Quinn Morrissey (second place international female youth champion, 2011), Afton
12 Caraway (first place national female champion, 2011), Mari Dickey (third place international female
13 champion), and Kim Tang (second place southern California regional champion.)

14 112. Sarah was requested to judge by the USA Yoga Federation in the 2011 USA
15 National Youth Competition, the 2012 Utah Regional Competition, and the 2012 Western Canadian
16 National Competition. Her fellow judges praised her for her deep understanding of postures.

17 113. During this time Sarah also learned that another young woman alleged that
18 she had been forced by Choudhury to massage his legs and inner thigh, while he was naked. She
19 also said that she had to massage another part of him, but broke down crying and could not finish
20 saying where she had been made to touch him.

21 114. Despite her prodigious achievements, Sarah was not permitted to teach
22 seminars or any classes that deviated from the standard 26 postures. This is contrary to the
23 contracts she signed, which only limited where she could teach (Bikram studios) and what she could
24 not do (modify the beginning series in any way.) The contract does not state that teachers are
25 forbidden from teaching additional material that is relevant to performing Hatha yoga, such as
26 postures.

1 115. Furthermore, to the extent the contract and recertification agreement purport
2 to limit signatories' abilities to teach yoga in the future, that is an unlawful restraint on competition
3 and therefore the contract is void.

4 116. Sarah's next contact with Choudhury occurred in the fall of 2011, when she
5 attended recertification.

6 117. Initially, Choudhury pretended not to know who she was in class, once again
7 punishing her for refusing his advances and daring to fight back.

8 118. Choudhury, as was his custom, frequently invited Sarah to his room. He also
9 continued to deliver the sexist and offensive patter that he delivered during all of his trainings.
10 Examples of this included that "all women need is a cork, men need a rubber band." This was a
11 reference to women needing to place a cork between their legs to somehow stop menstruation, and
12 men needing a rubber band to in some fashion restrain their genitals. When a woman was being
13 "bitchy" he would say "she is being a bitch—she must have—what is it called—ABC—no, FYD—
14 no," until the crowd would eventually yell "PMS." Sarah heard him play through this same routine
15 multiple times, where he would act falsely innocent. Choudhury would also make reference to the
16 fact that men were an alleged combination of a pig, a goat, and a dog, to excuse sexual or
17 inappropriate behavior for men, and frequently engaged in homophobic rants.

18 119. Following the 2011 recertification training, although Sarah was not breaking
19 any rules, Choudhury, through his personal assistant Judes Yang, began interfering with Sarah's
20 success, as part of his ongoing conspiracy to punish her for refusing to submit to his sexual
21 advances and daring to criticize him for attacking her and propositioning her repeatedly.

22 120. Sarah was invited to teach an anniversary class for a new yoga studio on July
23 28, 2012, in Huntington Beach. Judes Yang, on information and belief, contacted the studio and
24 questioned them about the class, in an attempt to frighten them into cancelling the class or changing
25 the content. Because Bikram studios are controlled by Choudhury, who removes offending studios
26 from his website and subjects them to legal action, through Judes Yang Choudhury was implicitly
27 threatening the owners of the studio.

1 **SEX-BASED DISCRIMINATION IN VIOLATION OF THE**
2 **UNRUH CIVIL RIGHTS ACT [CALIFORNIA CIVIL CODE § 51]**
3 **(Plaintiff Baughn Against all Defendants)**

4 126. Plaintiff, individually, incorporates by reference as though fully set forth
5 herein, each and every allegation set forth above in this Complaint. As a first, separate and distinct
6 cause of action, Plaintiff complains against Defendants and each of them as follows:

7 127. Defendant Bikram Choudhury is being sued in his capacity as a business
8 owner and the alter ego of Defendants Yoga College and Does 1-50.

9 128. Civil Code section 51, et seq., also known as the Unruh Act, provides that all
10 persons in the state are entitled to the “full and equal accommodations, advantages, facilities,
11 privileges, or services in all business establishments of every kind whatsoever,” regardless of sex.

12 129. Plaintiff is informed and believed and thereon alleges that the
13 aforementioned conduct of defendants, and each of them, denied, aided, or incited in a denial of,
14 discriminated or made a distinction that denied plaintiff full and equal advantages, privileges, and
15 services to Plaintiff, based solely upon plaintiff’s sex and complaints about Defendant Bikram
16 Choudhury’ sexual abuse, and therefore constituted a violation of the Unruh Act.

17 130. This claim is made well with the two year statute of limitations. For example,
18 the last time that Defendant Bikram Choudhury physically touched Plaintiff was at the
19 recertification training in November 2011 when Defendant Bikram Choudhury hugged and kissed
20 Plaintiff and asked her to his room. Initially, during the training, he pretended not to know Plaintiff
21 and sang “Que Sera Sera” which is the same song he sang to her in taunting fashion after he
22 assaulted her in 2005 and 2008; the 2011 experience a “triggering” event causing Plaintiff to re-
23 experience the prior 2005 and 2008 assaults, which in turn caused her severe emotional distress.
24 This 2011 touching was unwanted and was done without Plaintiff’s consent.

25 131. As a proximate result of the wrongful actions of defendants, and each of
26 them, Plaintiff has suffered harm, including but not limited to, lost earnings and other employment
27 benefits, loss of future employment benefits, including insurance and pension, mental anguish and
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1 emotional distress, bills for medical and psychological treatment, humiliation, embarrassment,
2 mental anguish, and physical harm, all in an amount to be proven at trial but exceeding the
3 minimum jurisdictional limits of this court.

4 132. Plaintiff is further informed and believes, and based thereon alleges, that
5 defendants, and each of them, acted and continue to act, with full knowledge of the consequences
6 and damage being caused to plaintiff, by defendants' actions, and defendants' actions were, and are,
7 willful, oppressive, and malicious. Accordingly, plaintiff is entitled to punitive damages against
8 defendants, and each of them, in a sum according to proof at trial.

9 133. Plaintiff has incurred, and will continue to incur, attorneys' fees in the
10 prosecution of this action and therefore demand such reasonable attorneys' fees and costs as set by
11 the court.

12 WHEREFORE, Plaintiff prays for relief as set forth herein.

13 **SECOND CAUSE OF ACTION**

14 **SEXUAL HARASSMENT IN VIOLATION OF THE**

15 **UNRUH CIVIL RIGHTS ACT [CALIFORNIA CIVIL CODE § 51.9]**

16 **(Against All Defendants)**

17 134. Plaintiff, individually, incorporates by reference as though fully set forth
18 herein, each and every allegation set forth above in this Complaint. As a second, separate and
19 distinct cause of action, Plaintiff complains against Defendants as follows:

20 135. Civil Code section 51.9, also part of the Unruh Act, provides that a
21 defendant is liable for sexual harassment where there is a professional relationship between the
22 plaintiff and defendant, including the teacher-student relationship and "The defendant has made
23 sexual advances, solicitations, sexual requests, demands for sexual compliance by the plaintiff, or
24 engaged in other verbal, visual, or physical conduct of a sexual nature or of a hostile nature based on
25 gender, that were unwelcome and pervasive or severe."
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1 136. At all times herein mentioned, there was a professional relationship between
2 plaintiff and the Defendants, namely, that she was Defendants' student and that they taught her
3 Bikram Yoga and certified her as an instructor.

4 137. In or about Spring of 2004, defendant Choudhury began making sexual
5 advances on Plaintiff. He eventually demanded sexual compliance, and when it was denied to him,
6 stripped Plaintiff of her rightful International title, ultimately sexually assaulted her, and continued to
7 retaliate against her for refusing his sexual advances, and continued to invite her to his room.

8 138. Plaintiff cannot easily terminate her relationship with defendant without
9 tangible hardship because she is an experienced and accomplished practitioner of Bikram Yoga, and
10 her considerable expertise would be difficult to otherwise employ, particularly because of Defendant
11 Choudhury's control over other practitioners of that form of Hatha Yoga. Terminating the
12 relationship would cause her great financial hardship, as she would no longer be able to teach at
13 approved Bikram studios.

14 139. This claim is made well with the two year statute of limitations. For example,
15 the last time that Defendant Bikram Choudhury physically touched Plaintiff was at the
16 recertification training in November 2011 when Defendant Bikram Choudhury hugged and kissed
17 Plaintiff and asked her to his room. Initially, during the training, he pretended not to know Plaintiff
18 and sang "Que Sera Sera" which is the same song he sang to her in taunting fashion after he
19 assaulted her in 2005 and 2008; the 2011 experience a "triggering" event causing Plaintiff to re-
20 experience the prior 2005 and 2008 assaults, which in turn caused her severe emotional distress.
21 This 2011 touching was unwanted and was done without Plaintiff's consent.

22 140. Plaintiff is informed and believed and thereon alleges that the
23 aforementioned conduct of defendants, and each of them, denied, aided, or incited in a denial of,
24 discriminated or made a distinction that denied plaintiff full and equal advantages, privileges, and
25 services to Plaintiff, based solely upon plaintiff's refusal to submit to sexual advances, and therefore
26 constituted a violation of the Unruh Act.

1 touching the person of plaintiff, pushing her down or grabbing her while making sexual comments,
2 and eventually culminating in a violent sexual assault.

3 147. This claim is made well with the two year statute of limitations. For example,
4 the last time that Defendant Bikram Choudhury physically touched Plaintiff was at the
5 recertification training in November 2011 when Defendant Bikram Choudhury hugged and kissed
6 Plaintiff and asked her to his room. Initially, during the training, he pretended not to know Plaintiff
7 and sang “Que Sera Sera” which is the same song he sang to her in taunting fashion after he
8 assaulted her in 2005 and 2008; the 2011 experience a “triggering” event causing Plaintiff to re-
9 experience the prior 2005 and 2008 assaults, which in turn caused her severe emotional distress.
10 This 2011 touching was unwanted and was done without Plaintiff’s consent.

11 148. Plaintiff’s sex was the reason for Defendant’s unwanted physical contact and
12 ultimate sexual assault.

13 149. Plaintiff is informed and believed and thereon alleges that the
14 aforementioned conduct of defendants, and each of them, denied, aided, or incited in a denial of,
15 discriminated or made a distinction that denied plaintiff full and equal advantages, privileges, and
16 services to Plaintiff, based solely upon plaintiff’s refusal to submit to sexual advances and her
17 objections to the physical assault that was inflicted upon her, and therefore constituted a violation of
18 the Ralph Act.

19 150. As a proximate result of the wrongful actions of defendants, and each of
20 them, Plaintiff has suffered harm, including but not limited to, lost earnings and other employment
21 benefits, loss of future employment benefits, including insurance and pension, humiliation,
22 embarrassment, mental anguish, and physical harm, all in an amount to be proven at trial but
23 exceeding the minimum jurisdictional limits of this court.

24 151. Plaintiff is further informed and believes, and based thereon alleges, that
25 defendants, and each of them, acted and continue to act, with full knowledge of the consequences
26 and damage being caused to plaintiff, by defendants’ actions, and defendants’ actions were, and are,
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28

1 willful, oppressive, and malicious. Accordingly, plaintiff is entitled to punitive damages against
2 defendants, and each of them, in a sum according to proof at trial.

3 152. Plaintiff has incurred, and will continue to incur, attorneys' fees in the
4 prosecution of this action and therefore demand such reasonable attorneys' fees and costs as set by
5 the court.

6 WHEREFORE, Plaintiff prays for relief as set forth herein.

7 **FOURTH CAUSE OF ACTION**

8 **INTERFERENCE WITH THE EXERCISE OF CIVIL RIGHTS**

9 **IN VIOLATION OF THE BANE ACT [CALIFORNIA CIVIL CODE § 52.1]**

10 **(Against All Defendants)**

11 153. Plaintiff, individually, incorporates by reference as though fully set forth
12 herein, each and every allegation set forth above in this Complaint. As a fourth, separate and
13 distinct cause of action, Plaintiff complains against Defendants as follows:

14 154. Civil Code section 52.1, the Bane Act, provides that it is unlawful to interfere
15 with the exercise or enjoyment of any rights under the Constitution and laws of this state and the
16 United States by use or attempted use of threats, intimidation or coercion.

17 155. At all times herein mentioned, there was a professional relationship between
18 plaintiff and the Defendants, namely, that plaintiff was a student whom they taught Bikram Yoga
19 and certified as an instructor.

20 156. On or about Spring of 2004, defendant Choudhury began making sexual
21 advances on Plaintiff. These advances were at time physical and violent in nature, at times involving
22 touching the person of plaintiff while making sexual comments and eventually culminating in a
23 violent sexual assault.

24 157. This claim is made well with the two year statute of limitations. For example,
25 the last time that Defendant Bikram Choudhury physically touched Plaintiff was at the
26 recertification training in November 2011 when Defendant Bikram Choudhury hugged and kissed
27 Plaintiff and asked her to his room. Initially, during the training, he pretended not to know Plaintiff
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1 and sang “Que Sera Sera” which is the same song he sang to her in taunting fashion after he
2 assaulted her in 2005 and 2008; the 2011 experience a “triggering” event causing Plaintiff to re-
3 experience the prior 2005 and 2008 assaults, which in turn caused her severe emotional distress.
4 This 2011 touching was unwanted and was done without Plaintiff’s consent.

5 158. Under Civil Code section 51, plaintiff has the right to full and equal
6 accommodation and service in all business establishments within the state, and may not be refused
7 entry or service because of her gender.

8 159. Plaintiff’s sex was the reason for Defendant’s unwanted physical contact and
9 ultimate sexual assault.

10 160. Plaintiff is informed and believed and thereon alleges that the
11 aforementioned conduct of defendants, and each of them, denied, aided, or incited in a denial of,
12 discriminated or made a distinction that denied plaintiff full and equal advantages, privileges, and
13 services to Plaintiff, based solely upon plaintiff’s refusal to submit to sexual advances and her
14 objections to the physical assault that was inflicted upon her, and therefore constituted a violation of
15 the Bane Act.

16 161. As a proximate result of the wrongful actions of defendants, and each of
17 them, Plaintiff has suffered harm, including but not limited to, lost earnings and other employment
18 benefits, loss of future employment benefits, including insurance and pension, humiliation,
19 embarrassment, mental anguish, and physical harm, all in an amount to be proven at trial but
20 exceeding the minimum jurisdictional limits of this court.

21 162. Plaintiff is further informed and believes, and based thereon alleges, that
22 defendants, and each of them, acted and continue to act, with full knowledge of the consequences
23 and damage being caused to plaintiff, by defendants’ actions, and defendants’ actions were, and are,
24 willful, oppressive, and malicious. Accordingly, plaintiff is entitled to punitive damages against
25 defendants, and each of them, in a sum according to proof at trial.

1 plaintiff discovers or reasonably should have discovered the
2 psychological injury or illness occurring after the age of majority
3 that was caused by the act, whichever date occurs later.

4 (c) For purposes of this section, "gender violence," is a form of
5 sex discrimination and means any of the following:

6 (1) One or more acts that would constitute a criminal offense
7 under state law that has as an element the use, attempted use, or
8 threatened use of physical force against the person or property of
9 another, committed at least in part based on the gender of the
10 victim, whether or not those acts have resulted in criminal
11 complaints, charges, prosecution, or conviction.

12 (2) A physical intrusion or physical invasion of a sexual nature
13 under coercive conditions, whether or not those acts have resulted in
14 criminal complaints, charges, prosecution, or conviction.

15 (d) Notwithstanding any other laws that may establish the
16 liability of an employer for the acts of an employee, this section
17 does not establish any civil liability of a person because of her or
18 her status as an employer, unless the employer personally committed
19 an act of gender violence.

20 167. Plaintiff Sarah Baughn alleges that in the Fall of 2011, and prior to the date,
21 Defendant Bikram Choudhury violated California Civil Code Section 52.4 in that one or more acts
22 inflicted on Plaintiff constitutes a criminal offense under state law that has as an element of use,
23 attempted use, or threatened use of physical force against her person, committed at least in part
24 based on the gender of Plaintiff, whether or not those acts have resulted in criminal complaints,
25 charges, prosecution, or conviction.

26 168. This claim is made well with the statute of limitations. For example, the last
27 time that Defendant Bikram Choudhury physically touched Plaintiff was at the recertification
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1 training in November 2011 when Defendant Bikram Choudhury hugged and kissed Plaintiff and
2 asked her to his room. Initially, during the training, he pretended not to know Plaintiff and sang
3 “Que Sera Sera” which is the same song he sang to her in taunting fashion after he assaulted her in
4 2005 and 2008; the 2011 experience a “triggering” event causing Plaintiff to re-experience the prior
5 2005 and 2008 assaults, which in turn caused her severe emotional distress. This 2011 touching
6 was unwanted and was done without Plaintiff’s consent.

7 169. Plaintiff Jane Doe alleges that Defendant Bikram Choudhury violated
8 California Civil Code Section 52.4 in that he engaged in a physical intrusion or physical invasion of
9 a sexual nature under coercive conditions, even if those acts have not yet resulted in criminal
10 complaints, charges, prosecution, or conviction.

11 170. As direct and proximate result of Defendant Bikram Choudhury’s violated
12 California Civil Code Section 52.4, Plaintiff Sarah Baughn suffered severe emotional distress, post
13 traumatic stress disorder, humiliation, embarrassment, mental and emotional distress and anxiety,
14 all in an amount according to proof at trial.

15 171. As direct and proximate result of Defendant Bikram Choudhury’s violation
16 of California Civil Code Section 52.4, Plaintiff Sarah Baughn suffered economic harm and other
17 consequential damages all in an amount according to proof at trial.

18 The acts of Defendant Bikram Choudhury, as alleged herein were willful, wanton,
19 and malicious and were intended to oppress and cause injury to Plaintiff Sarah Baughn. In light of
20 the willful, wanton, malicious and intentional conduct engaged in by Defendant Bikram
21 Choudhury, Plaintiff Sarah Baughn is entitled to an award of punitive damages.

22 172. Plaintiff Sarah Baughn also seeks declaratory and injunctive relief as set forth
23 below.

24 173. Plaintiff has incurred, and will continue to incur, attorneys’ fees in the
25 prosecution of this action and therefore demand such reasonable attorneys’ fees and costs as set by
26 the court.

27 WHEREFORE, Plaintiff prays for relief as set forth herein.

1 Champion, and began preventing Plaintiff from teaching classes with a discussion component by
2 contacting studios that intended to present those classes and telling them that Plaintiff was “not
3 approved” to teach seminars.

4 183. This conduct was wrongful for reasons other than that it constituted
5 interference with a prospective economic advantage. The conduct also violated the Unruh Civil
6 Rights Act, Civil Code section 51 et seq. and particularly section 51.9; the Ralph Act; the Bane Act;
7 Business and Professions Code section 17200 (Unfair/Unlawful Competition); constituted an
8 unlawful civil conspiracy; was defamatory; constituted intentional and/or negligent infliction of
9 emotional distress; and was negligent.

10 184. These disruptions to Plaintiff’s teaching career prevented her from teaching
11 courses and earning money that she otherwise would have earned.

12 185. As a result of Defendants’ conduct and the prevention and/or disruption of
13 contract negotiations between Plaintiff and potential customers, Plaintiff has suffered damages in an
14 amount to be proved at trial.

15 186. The aforementioned acts of Defendants were willful and oppressive or
16 fraudulent or malicious. Plaintiff is therefore entitled to punitive damages.

17 187. Defendants threaten to, and unless restrained, will continue to disrupt other
18 business relationships between Plaintiff and potential customers, to Plaintiff’s great irreparable
19 injury, for which damages would not afford adequate relief, in that they would not completely
20 compensate for the injury to Plaintiff’s business reputation and goodwill.

21 WHEREFORE, Plaintiff prays for relief as set forth herein.

22 **EIGHTH CAUSE OF ACTION**

23 **CIVIL CONSPIRACY**

24 **(Against All Defendants)**

25 188. Plaintiff, individually, incorporates by reference as though fully set forth
26 herein, each and every allegation set forth above in this Complaint. As an eleventh, separate and
27 distinct cause of action, Plaintiff complains against Defendants as follows:

1 194. These statements were defamatory *per se* insofar as they related to Plaintiff's
2 qualifications in her professions and trades.

3 195. While the precise date of all these publications are not known to Plaintiff,
4 Plaintiff is informed and believe that these various publications started in or about Winter of 2008
5 and continued to the present, and that it was foreseeable that they would be re-published by the
6 Defendants and the non-privileged third parties to whom Defendants spread the defamatory
7 statements.

8 196. During the above-described time frame, Defendants did negligently,
9 recklessly and intentionally cause excessive and unsolicited publication of defamation, of and
10 concerning Plaintiff, to third persons who had no need or desire to know. Those third persons to
11 whom Defendants published this defamation are believed to include, but are not limited to the other
12 Defendants named in this Action, and each of them, as well as the Doe Defendants.

13 197. The defamatory publications consisted or oral, knowingly false and
14 unprivileged communications, tending directly to injure Plaintiff and her personal, business and
15 professional reputation.

16 198. In addition, Plaintiff has been compelled to self-disclose this false
17 information and untrue statements. Plaintiff is informed and believes that the negligent, reckless,
18 and intentional publications made by Defendants, and each of them, that it was foreseeable that
19 these statements would be published and re-published.

20 199. Plaintiff is informed, believes and fears that these unprivileged defamatory
21 statements will continue to be published by Defendants and will be re-published by their recipients,
22 all to the ongoing harm and injury to Plaintiff's business, professional and personal reputation.

23 200. The defamatory meaning of all the above-described, false and defamatory
24 statements and their reference to Plaintiff was understood by Defendants. These statements were
25 false and were understood as assertions of fact, and not as opinion.

26 201. Each of these false defamatory *per se* publications (as set forth above) were
27 negligently, recklessly, and intentionally published in a manner equaling malice and abuse of any
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1 alleged conditional privilege. These publications, and each of them, were made with hatred, ill will,
2 and an intent to vex, harass, annoy, and injure Plaintiff in order to justify the illegal and cruel actions
3 of Defendants and to cause further damage to Plaintiff's professional and personal reputation, for
4 the purpose of causing Plaintiff to be terminated and in retaliation for her reporting and opposing
5 discrimination and harassment.

6 202. Each of these publications by Defendants was made with the knowledge that
7 no investigation supported the unsubstantiated and obviously false statements. Defendants
8 published these statements knowing them to be false and unsubstantiated by any reasonable
9 investigation and the product of hostile witnesses.

10 203. Not only did Defendants have no reasonable basis to believe these
11 statements, she also had no belief in the truth of these statements and, in fact, knew the statements
12 to be false.

13 204. Defendants committed the despicable acts as herein alleged maliciously,
14 fraudulently, and oppressively, with the wrongful intent of injuring Plaintiff, and have acted with an
15 improper and evil motive amounting to malice, and fraud and in conscious disregard of Plaintiff's
16 rights. Because the despicable acts taken toward Plaintiff were carried out in a deliberate, cold,
17 callous and intentional manner in order to injure and damage Plaintiff, she is entitled to recover
18 punitive damages from Defendants in an amount according to proof.

19 WHEREFORE, Plaintiff prays for relief as set forth herein.

20 **TENTH CAUSE OF ACTION**

21 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

22 **(Against All Defendants)**

23 205. Plaintiff incorporates by reference as though fully set forth herein, each and
24 every allegation set forth above in this Complaint. As a thirteenth, separate and distinct claim for
25 relief, Plaintiff complains against Defendants:
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1 206. This is an action for damages pursuant to the common law of the State of
2 California as mandated by the California Supreme Court in the decision of *Rojo v. Kliger* (1990) 52
3 Cal. 3d 65.

4 207. Defendants engaged in the extreme and outrageous conduct herein above
5 alleged with wanton and reckless disregard of the probability of causing Plaintiff to suffer severe
6 emotional distress.

7 208. This claim is made well with the statute of limitations. For example, the last
8 time that Defendant Bikram Choudhury physically touched Plaintiff was at the recertification
9 training in November 2011 when Defendant Bikram Choudhury hugged and kissed Plaintiff and
10 asked her to his room. Initially, during the training, he pretended not to know Plaintiff and sang
11 “Que Sera Sera” which is the same song he sang to her in taunting fashion after he assaulted her in
12 2005 and 2008; the 2011 experience a “triggering” event causing Plaintiff to re-experience the prior
13 2005 and 2008 assaults, which in turn caused her severe emotional distress. This 2011 touching was
14 unwanted and was done without Plaintiff’s consent.

15 209. As a proximate result of the extreme and outrageous conduct engaged in by
16 Defendants, Plaintiff suffered humiliation, mental anguish and extreme emotional and physical
17 distress all to her general damage in an amount according to proof at trial.

18 210. Defendants’ conduct as herein alleged was malicious and oppressive in that it
19 was conduct carried on by Defendants in a willful and conscious disregard of Plaintiff’s rights and
20 subjected her to cruel and unjust hardship. Plaintiff is therefore entitled to an award of punitive
21 damages against Defendants.

22 211. As a direct, foreseeable and legal result of Defendants’ unlawful acts, Plaintiff
23 has suffered and continues to suffer substantial losses in earnings, bonuses and other employment
24 benefits, in addition to expenses incurred in obtaining alternative employment, and has suffered and
25 continue to suffer humiliation, embarrassment, severe mental and emotional distress, and
26 discomfort, all to Plaintiff Baughn's damage in an amount to be proven at trial.

27 WHEREFORE, Plaintiff prays for relief as set forth herein.
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1 **ELEVENTH CAUSE OF ACTION**

2 **NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**

3 **(Against All Defendants)**

4 212. Plaintiff, individually, incorporates by reference as though fully set forth
5 herein, each and every allegation set forth above in this Complaint. As a fourteenth, separate and
6 distinct cause of action, Plaintiff complains against Defendants as follows:

7 213. Defendants owed Plaintiff a duty of care not to cause her emotional distress.

8 214. Defendants breached this duty of care by way of their own conduct as
9 alleged herein.

10 215. For example, the last time that Defendant Bikram Choudhury physically
11 touched Plaintiff was at the recertification training in November 2011 when Defendant Bikram
12 Choudhury hugged and kissed Plaintiff and asked her to his room. Initially, during the training, he
13 pretended not to know her and sang “Que Sera Sera” which is the same song he sang to her in
14 taunting fashion after he assaulted her in 2005 and 2008; this experience 2011 was a “triggering”
15 event causing Plaintiff to re-experience the prior 2005 and 2008 assaults, which in turn caused her
16 severe emotional distress. This 2011 touching was unwanted and was done without Plaintiff
17 consent.

18 216. Defendants’ conduct form 2008 and continuing in the present has caused
19 Plaintiff emotional distress.

20 217. As a proximate result of Defendants’ extreme and outrageous acts, Plaintiff
21 has suffered emotional distress, humiliation and embarrassment.

22 218. Defendants’ conduct has caused and continues to cause Plaintiff substantial
23 losses in earnings, significant reputation and professional injury, medical expenses, future earnings
24 and benefits, costs of suit, embarrassment and anguish, all to her damage in an amount according to
25 proof.

26 WHEREFORE, Plaintiff prays for relief as set forth herein.

1 **TWELFTH CAUSE OF ACTION**

2 **NEGLIGENCE**

3 **(Against All Defendants)**

4 219. Plaintiff, individually, incorporates by reference as though fully set forth
5 herein, each and every allegation set forth above in this Complaint. As a fifteenth, separate and
6 distinct cause of action, Plaintiff complains against Defendants as follows:

7 220. Defendants and Does 1-25 inclusive, in their individual capacities and official
8 capacities, committed the negligent actions and/or negligent failures to act, as set forth herein above
9 and those acts proximately cause the emotional, physical and financial injuries visited upon plaintiff.

10 221. Defendants owed Plaintiff a duty of care not to cause her emotional distress.

11 222. Defendants breached this duty of care by way of their own conduct as
12 alleged herein.

13 223. For example, the last time that Defendant Bikram Choudhury physically
14 touched Plaintiff was at the recertification training in November 2011 when Defendant Bikram
15 Choudhury hugged and kissed Plaintiff and asked her to his room. Initially, during the training, he
16 pretended not to know her and sang "Que Sera Sera" which is the same song he sang to her in
17 taunting fashion after he assaulted her in 2005 and 2008; this experience 2011 was a "triggering"
18 event causing Plaintiff to re-experience the prior 2005 and 2008 assaults, which in turn caused her
19 severe emotional distress. This 2011 touching was unwanted and was done without Plaintiff
20 consent. Defendants' conduct from 2008 and continuing in the present has caused Plaintiff
21 emotional distress.

22 224. As a proximate result of Defendants' extreme and outrageous acts, Plaintiff
23 has suffered emotional distress, humiliation and embarrassment.

24 225. Defendants' conduct has caused and continues to cause Plaintiff substantial
25 losses in earnings, significant reputation and professional injury, medical expenses, future earnings
26 and benefits, costs of suit, embarrassment and anguish, all to her damage in an amount according to
27 proof.

1 WHEREFORE, Plaintiff prays for relief as set forth herein.

2 **THIRTEENTH CAUSE OF ACTION**

3 **NEGLIGENT HIRING, TRAINING, SUPERVISION, AND DISCIPLINE**

4 **(Against Yoga College)**

5 226. Plaintiff, individually, incorporates by reference as though fully set forth
6 herein, each and every allegation set forth above in this Complaint. As a sixteenth, separate and
7 distinct cause of action, Plaintiff complains against Defendants as follows:

8 227. Defendant Yoga College had a mandatory duty of care to properly hire, train,
9 retain, supervise and discipline its employees so as to avoid unreasonable harm to citizens. With
10 deliberate indifference Yoga College failed to take necessary, proper, or adequate measures in order
11 to prevent the violation of Plaintiff's rights and injury to Plaintiff. Among other acts and/or failures
12 to act, Yoga College retained Defendant Choudhury despite his long and well-known history of
13 abusing and sexually harassing female students and trainees based on sex.

14 228. Defendant Yoga College breached a duty of care to law-abiding citizens and
15 failed to adequately train employees to treat citizens in a manner that is not sexually discriminatory
16 and/or harassing and/or violent. This lack of adequate supervisory training, and/or policies and
17 procedures demonstrates a failure to make reasonable attempts and to prevent sexually
18 discriminatory behavior toward consumers. In addition, the retention of Defendant Choudhury
19 despite his well-known pattern of abuse and harassment was negligent.

20 229. Defendant Yoga College committed the negligent actions and/or negligent
21 failures to act, as set forth herein above and those acts proximately cause the emotional, physical and
22 financial injuries visited upon plaintiff.

23 WHEREFORE, Plaintiff prays for relief as set forth herein.

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25 **FOURTEENTH CAUSE OF ACTION**

26 **UNLAWFUL NON-COMPETE AGREEMENT**

27 **[BUSINESS AND PROFESSIONS CODE § 16600 ET SEQ.]**

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(Against All Defendants)

230. Plaintiff, individually, incorporates by reference as though fully set forth herein, each and every allegation set forth above in this Complaint. As a seventeenth, separate and distinct cause of action, Plaintiff complains against Defendants as follows:

231. As a condition of attending teacher training, being certified as a Bikram Yoga Instructor, and being recertified as such, Plaintiff was required to sign contracts purporting to limit her ability to compete against Defendants in the future.

232. These contracts, by their terms, violation California Business and Professions Code section 16600, which bars non-compete agreements of this type, and are therefore void.

233. Plaintiff brings this cause of action for declaratory relief and seeks a declaration that the contracts are void.

WHEREFORE, Plaintiff prays for relief as set forth herein.

FIFTEENTH CAUSE OF ACTION

CLAIM FOR DECLARATORY AND INJUNCTIVE RELIEF

(Against All Defendants)

234. Plaintiff incorporates by reference as though fully set forth herein, each and every allegation set forth above in this Complaint. As an eighteenth, separate and distinct claim for relief, Plaintiff complains against Defendants and each of them, as follows:

235. For all the reasons set forth above, Plaintiff seeks a declaration from the Court that she was the rightful 2008 International Champion, that she is qualified to be on the approved seminar leaders list, and that the contracts she signed with Defendants are void.

236. Further, Plaintiff seeks a Court Order enjoining Defendants from preventing Plaintiff from teaching advanced yoga classes, whether they do or do not constitute seminars.

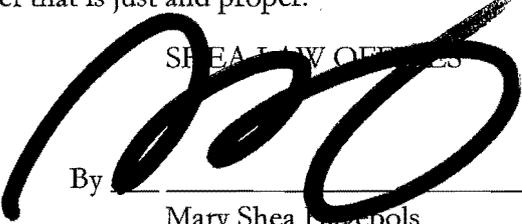
WHEREFORE, Plaintiff prays for relief as set forth herein.

PRAYER FOR RELIEF

Wherefore Plaintiff Baughn prays for judgment against Defendants, and each of them, as follows:

1. For a money judgment representing compensatory damages including lost wages, earnings, and all other sums of money, together with interest on these amounts, according to proof;
2. For an award of money judgment for mental pain and anguish and severe emotional distress, including medical special damages, according to proof;
3. For an award of money judgment for defamation *per se*;
4. Punitive damages, according to proof;
5. For attorney's fees and costs;
6. For a statutory civil penalty in the sum of \$25,000, pursuant to Civ. Code section 52(b);
7. For prejudgment and post-judgment interest;
8. For declarative and injunctive relief; and
9. For any other relief that is just and proper.

Dated: August 29, 2014

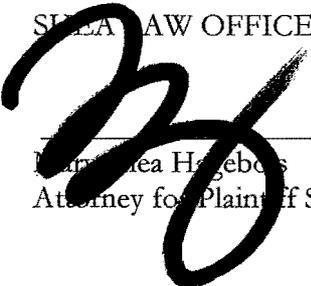
By 

Mary Shea Hegebols
Attorney for Plaintiff SARAH BAUGHN

JURY TRIAL DEMANDED

Plaintiff SARAH BAUGH demands trial of all issues by jury.

Dated: August 29, 2014

By: 

Mary Shea Hegebols
Attorney for Plaintiff SARAH BAUGHN

PROOF OF SERVICE

Sarah Baughn v. Bikram Choudhury, et al.
Los Angeles County Superior Court, Case No. BC502424

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is 1814 Franklin Street, Suite 800, Oakland, California 94612 and is in the County of Alameda. I am over the age of 18 years and not a party to the within entitled action. I served the within:

1. FIRST AMENDED COMPLAINT

(By U.S. Mail) I deposited the above listed document(s) with the United States Postal Service with postage fully prepaid to the person(s) at the address(es) listed below.

(By United Parcel Service Overnight) I deposited the above listed document(s) with the United Parcel Service (UPS) with postage fully prepaid to the person(s) at the address(es) listed below.

(By Facsimile Transmission) By transmitting a true copy thereof to the following person(s) at the receiving facsimile machine numbers shown below. The transmission was reported as complete and without error.

(By Electronic Mail) By transmitting a true copy thereof as a .pdf attachment on August 29, 2014 to the following person(s) at the receiving e-mail addresses shown below. The transmission was reported as complete and without error.

(By Personal Service) I caused each such envelope to be delivered by hand to the addressee(s) noted below.

On the following attorney(s) of record and/or interested parties:

Carney R. Shegerian, Esq. SHEGERIAN & ASSOCIATES, INC. 225 Arizona Avenue, Suite 400 Santa Monica, California 90401 Fax: (310) 860-0771 Email: cshegerian@shegerianlaw.com	Co-Counsel for Plaintiff
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Attorneys for Defendant Bikram's Yoga
College of India, L.P.

6 I declare under penalty of perjury that the foregoing is true and correct, and that this
7 declaration was executed on Friday, August 29, 2014, in Oakland, California.
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11 Manoj Shekhargobol