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5 Attorneys for Plaintiff,
6 CITY OF CHULA VISTA, a public entity

By: R. CERSOSIMO, Deputy
GIC 817305

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF SAN DIEGO, SOUTH COUNTY DIVISION

10 CITY OF CHULA VISTA, a public)
entity)
11)
Plaintiff,)
12)
v.)
13 DOUGLAS E. BARNHART, INC., a)
California corporation; LPA,)
14 INC., a California)
corporation, and DOES 1)
15 through 125, inclusive.)
16)
Defendants.)

Case No. IC002300
COMPLAINT FOR DAMAGES, BREACH
OF CONTRACT, NEGLIGENCE,
MISREPRESENTATION, BREACH OF
EXPRESS WARRANTY, BREACH OF
IMPLIED WARRANTY AND STRICT
LIABILITY
[GENERAL CIVIL]

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18 For its complaint Plaintiff, the CITY OF CHULA VISTA
19 ("CITY") alleges as follows:

20 GENERAL ALLEGATIONS

21 1. CITY is now and at all times relevant hereto has been a
22 public entity existing under and by virtue of the laws of the
23 State of California, and located in San Diego County.

24 2. CITY is, and at all times relevant hereto was, the
25 owner of certain real property, including easements, upon which
26 was constructed an approximately 37,000 square foot public
27 library known as the SOUTH CHULA VISTA LIBRARY ("LIBRARY"),

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