

EXHIBIT
19

PLD-C-001

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Angie Hoar, 212152; Kelly Hill, 312363; Jennifer Thomas, 335997; Christina Melhouse, 201818 Gurstel Law Firm P.C. 3914 Murphy Canyon Road, Suite A162 San Diego, CA 92123 TELEPHONE NO: 85877-344-4002 FAX NO. (Optional): 877-750-6335 E-MAIL ADDRESS (Optional): a.hoar@gurstel.com; k.hill@gurstel.com ATTORNEY FOR (Name): Plaintiff Allied Electronics Inc.		FILED SUPERIOR COURT-STOCKTON 2021 NOV -1 PM 2:47 BRANDON E. RILEY, CLERK <i>Judy Y. Haley</i> DEPUTY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN JOAQUIN STREET ADDRESS: 180 E Weber Ave MAILING ADDRESS: 180 E Weber Ave CITY AND ZIP CODE: Stockton, CA 95202 BRANCH NAME: Stockton Courthouse - Limited Civil Division		#698156 \$370.-
PLAINTIFF: Allied Electronics Inc., a corporation DEFENDANT: Guntert & Zimmerman, Const. Div. Inc., a corporation; ☒ DOES 1 TO 20, inclusive		
CONTRACT ☒ COMPLAINT ☐ AMENDED COMPLAINT (Number): ☐ CROSS-COMPLAINT ☐ AMENDED CROSS-COMPLAINT (Number):		
Jurisdiction (check all that apply): ☒ ACTION IS A LIMITED CIVIL CASE Amount demanded ☐ does not exceed \$10,000 ☒ exceeds \$10,000 but does not exceed \$25,000 ☐ ACTION IS AN UNLIMITED CIVIL CASE (exceeds \$25,000) ☒ ACTION IS RECLASSIFIED by this amended complaint or cross-complaint ☐ from limited to unlimited ☐ from unlimited to limited		CASE NUMBER: STK-CV-LCCR-2021- <u>10807</u>

1. **Plaintiff* (name or names):**
Allied Electronics Inc., a corporation
alleges causes of action against **defendant* (name or names):**
Guntert & Zimmerman, Const. Div. Inc., a corporation
2. This pleading, including attachments and exhibits, consists of the following number of pages: 3
3. a. Each plaintiff named above is a competent adult
☒ except plaintiff (name): Allied Electronics Inc.
 - (1) ☒ a corporation qualified to do business in California
 - (2) ☐ an unincorporated entity (describe):
 - (3) ☐ other (specify):
- b. ☐ Plaintiff (name):
 - a. ☐ has complied with the fictitious business name laws and is doing business under the fictitious name (specify):
 - b. ☐ has complied with all licensing requirements as a licensed (specify):
- c. ☐ Information about additional plaintiffs who are not competent adults is shown in Attachment 3c.
4. a. Each defendant named above is a natural person
☒ except defendant (name): Guntert & Zimmerman ☐ except defendant (name):
 - (1) ☐ a business organization, form unknown
 - (2) ☒ a corporation
 - (3) ☐ an unincorporated entity (describe):
 - (4) ☐ a public entity (describe):
 - (5) ☐ other (specify):

* If this form is used as a cross-complaint, plaintiff means cross-complainant and defendant means cross-defendant.

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4. (Continued)

b. The true names of defendants sued as Does are unknown to plaintiff.

- (1) ☐ Doe defendants (specify Doe numbers): _____ were the agents or employees of the named defendants and acted within the scope of that agency or employment.
- (2) ☒ Doe defendants (specify Doe numbers): 1 to 20 are persons whose capacities are unknown to plaintiff.

c. ☐ Information about additional defendants who are not natural persons is contained in Attachment 4c.d. ☐ Defendants who are joined under Code of Civil Procedure section 382 are (names):5. ☐ Plaintiff is required to comply with a claims statute, and

- a. ☐ has complied with applicable claims statutes, or
- b. ☐ is excused from complying because (specify):

6. ☐ This action is subject to ☐ Civil Code section 1812.10 ☐ Civil Code section 2984.4.

7. This court is the proper court because

- a. ☒ a defendant entered into the contract here.
- b. ☒ a defendant lived here when the contract was entered into.
- c. ☐ a defendant lives here now.
- d. ☒ the contract was to be performed here.
- e. ☒ a defendant is a corporation or unincorporated association and its principal place of business is here.
- f. ☐ real property that is the subject of this action is located here.
- g. ☐ other (specify):

8. The following causes of action are attached and the statements above apply to each (each complaint must have one or more causes of action attached):

- ☐ Breach of Contract
- ☒ Common Counts
- ☐ Other (specify):

9. ☐ Other allegations:

10. Plaintiff prays for judgment for costs of suit; for such relief as is fair, just, and equitable; and for

- a. ☒ damages of: \$ 21,375.96
- b. ☒ interest on the damages
- (1) ☐ according to proof
- (2) ☒ at the rate of (specify): 10 percent per year from (date): November 14, 2018
- c. ☒ attorney's fees
- (1) ☒ of: \$ 1,200.00 CC 1717.5
- (2) ☐ according to proof.
- d. ☐ other (specify):

11. ☐ The paragraphs of this pleading alleged on information and belief are as follows (specify paragraph numbers):

Date: 10/27/2021

Angie Hoar, Esq.

(TYPE OR PRINT NAME)

(SIGNATURE OF PLAINTIFF OR ATTORNEY)

(If you wish to verify this pleading, affix a verification.)

SHORT TITLE:

Allied Electronics Inc. v. Guntert & Zimmerman, Const. Div. Inc.

CASE NUMBER:

1st

(number)

CAUSE OF ACTION—Common Counts

ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

CC-1. Plaintiff (name): Allied Electronics Inc., a corporation

alleges that defendant (name): Guntert & Zimmerman, Const. Div. Inc., a corporation; Does 1 to 20
 became indebted to ☒ plaintiff ☐ other (name):

a. ☒ within the last four years(1) ☒ on an open book account for money due.(2) ☐ because an account was stated in writing by and between plaintiff and defendant in which it was agreed that defendant was indebted to plaintiff.b. ☒ within the last ☐ two years ☒ four years(1) ☐ for money had and received by defendant for the use and benefit of plaintiff.(2) ☐ for work, labor, services and materials rendered at the special instance and request of defendant and for which defendant promised to pay plaintiff.☐ the sum of \$☐ the reasonable value.(3) ☒ for goods, wares, and merchandise sold and delivered to defendant and for which defendant promised to pay plaintiff☒ the sum of \$ 21,375.96☒ the reasonable value.(4) ☐ for money lent by plaintiff to defendant at defendant's request.(5) ☐ for money paid, laid out, and expended to or for defendant at defendant's special instance and request.(6) ☐ other (specify):

CC-2. \$ 21,375.96, which is the reasonable value, is due and unpaid despite plaintiff's demand,

plus prejudgment interest ☐ according to proof ☒ at the rate of 10 percent per year

from (date): November 14, 2018

CC-3. ☒ Plaintiff is entitled to attorney fees by an agreement or a statute☒ of \$ 1,200.00 CC 1717.5☐ according to proof.CC-4. ☒ Other:

Costs of suit

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