



COUNTY OF LOS ANGELES
OFFICE OF THE COUNTY COUNSEL

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August 24, 2017

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TO: LORI GLASGOW
Executive Officer
Board of Supervisors

Attention: Agenda Preparation

FROM: ROGER H. GRANBO 
Senior Assistant County Counsel
Executive Office

RE: **Item for the Board of Supervisors' Agenda**
County Claims Board Recommendation
Emma Hakobyan v. County of Los Angeles, et al.
Los Angeles Superior Court Case No. BC 514205

Attached is the Agenda entry for the Los Angeles County Claims Board's recommendation regarding the above-referenced matter. Also attached is the Case Summary and the Summary Corrective Action Plan to be made available to the public.

It is requested that this recommendation, the Case Summary, and the Summary Corrective Action Plan be placed on the Board of Supervisors' agenda.

RHG:scr

Attachments

Board Agenda

MISCELLANEOUS COMMUNICATIONS

Los Angeles County Claims Board's recommendation: Authorize settlement of the matter entitled Emma Hakobyan v. County of Los Angeles, et al., Los Angeles Superior Court Case No. BC 514 205 in the amount of \$650,000 and instruct the Auditor-Controller to draw a warrant to implement this settlement from the Department of Parks and Recreation's budget.

This dangerous condition lawsuit arises from alleged injuries received in a trip and fall accident in the picnic area of the Castaic Lake Recreation Area.

CASE SUMMARY

INFORMATION ON PROPOSED SETTLEMENT OF LITIGATION

CASE NAME	Emma Hakobyan v. County of Los Angeles, et al.
CASE NUMBER	BC514205
COURT	Los Angeles Superior Court
DATE FILED	July 3, 2013
COUNTY DEPARTMENT	Department of Parks and Recreation
PROPOSED SETTLEMENT AMOUNT	\$ 650,000
ATTORNEY FOR PLAINTIFF	Chris Ardalan Ardalan & Associates
COUNTY COUNSEL ATTORNEY	Richard K. Kudo Principal Deputy County Counsel
NATURE OF CASE	This lawsuit arises from a trip and fall accident involving plaintiff Emma Hakobyan that occurred in the picnic area of Castaic Lake Recreation Area. Ms. Hakobyan claims to have suffered injuries as a result of the accident. Due to the risks and uncertainties of litigation, a full and final settlement of the case is warranted.
PAID ATTORNEY FEES, TO DATE	\$ 264,075
PAID COSTS, TO DATE	\$ 62,690



Summary Corrective Action Plan

The intent of this form is to assist departments in writing a corrective action plan summary for attachment to the settlement documents developed for the Board of Supervisors and/or the County of Los Angeles Claims Board. The summary should be a specific overview of the claims/lawsuits' identified root causes and corrective actions (status, time frame, and responsible party). This summary does not replace the Corrective Action Plan form. If there is a question related to confidentiality, please consult County Counsel.

Date of incident/event:	July 28, 2012
Briefly provide a description of the incident/event:	A 78 year old woman alleges she was injured when she tripped on the edge of the concrete pad in the picnic area at Castaic Lake when she stood up from the picnic table.

1. Briefly describe the root cause(s) of the claim/lawsuit:

The distance between the edge of the concrete pad and the picnic table made it difficult to walk between the edge of the concrete pad and picnic table without coming into close proximity to the edge of the concrete pad.

2. Briefly describe recommended corrective actions:
(Include each corrective action, due date, responsible party, and any disciplinary actions if appropriate)

All picnic tables at Castaic Lake that have a similar distance to the edge of their respective concrete pads as the table and concrete pad where the incident occurred have been scheduled to be removed to provide more clearance.

An investigation was conducted and no administrative violations were found; however, a memo will be sent out reminding employees to obtain the necessary approval for construction projects. In the event that modifications or construction to the original design needs to be made; copies of the original design will be kept in perpetuity at the Department of Public Works Building and Safety in both hardcopy and microfiche copy, and a hardcopy will be kept in perpetuity in the Department's Planning and Development section and Regional headquarters for easy access so as to ensure any modifications comply with the original design.

3. State if the corrective actions are applicable to only your department or other County departments:
(If unsure, please contact the Chief Executive Office Risk Management for assistance)

- Does not appear to have County-wide or other department implications.
- Potentially has an implication to other departments (i.e., all human services, all safety departments, or one or more other departments).
- Potentially has County-wide implications.

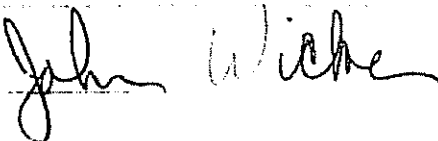
County of Los Angeles
Summary Corrective Action Plan

Name: (Risk Management Coordinator)
Donald Limbrick for Anush Gambaryan

Signature: 

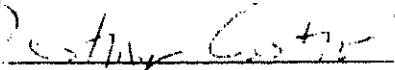
Date: 6-1-17

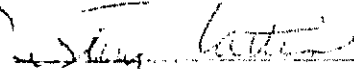
Name: (Department Head)

Signature: 

Date: 6/15/17

Chief Executive Office Risk Management

Name: 

Signature: 

Date: 6/1/2017