

<p>ATTORNEY OR PARTY WITHOUT ATTORNEY STATE BAR NUMBER:</p> <p>NAME: Harry Nalbandyan, Esq. (SBN 305116)   Gerardo Moreno, Esq. (SBN 347235)</p> <p>FIRM NAME: Levin &amp; Nalbandyan LLP</p> <p>STREET ADDRESS: 11132 Ventura Blvd.</p> <p>CITY: Los Angeles STATE: CA ZIP CODE: 91604</p> <p>TELEPHONE NO.: (213) 232-4848 FAX NO.: (213) 232-4849</p> <p>EMAIL ADDRESS: piservice@Intriallawyers.com</p> <p>ATTORNEY FOR (name): Plaintiff, ZAHRA GHARRAEE</p> <p><b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF STANISLAUS</b></p> <p>STREET ADDRESS: 800 11th St.</p> <p>MAILING ADDRESS: same as above</p> <p>CITY AND ZIP CODE: Modesto, 95354</p> <p>BRANCH NAME: Stanislaus County Superior Court</p>	<p><i>FOR COURT USE ONLY</i></p> <p>Electronically Filed 10/8/2025 2:18 PM Superior Court of California County of Stanislaus Hugh K. Swift Clerk of the Court By: Michelle Woerner, Deputy</p>
<p>PLAINTIFF/PETITIONER: ZAHRA GHARRAEE</p> <p>DEFENDANT/RESPONDENT: TRADER JOE'S COMPANY, ET AL.</p>	
<p style="text-align: center;"><b>NOTICE OF ENTRY OF JUDGMENT OR ORDER</b></p> <p>(Check one): <input checked="" type="checkbox"/> <b>UNLIMITED CASE</b> <input type="checkbox"/> <b>LIMITED CASE</b></p> <p>(Amount demanded exceeded \$35,000) (Amount demanded was \$35,000 or less)</p>	<p>CASE NUMBER: CV-21-005695</p>

**TO ALL PARTIES :**

1. A judgment, decree, or order was entered in this action on (date): October 8, 2025
2. A copy of the judgment, decree, or order is attached to this notice.

Date: October 8, 2025

Gerardo Moreno, Esq.  
(TYPE OR PRINT NAME OF  ATTORNEY  PARTY WITHOUT ATTORNEY)

(SIGNATURE)

PLAINTIFF/PETITIONER: ZAHRA GHARRAEE DEFENDANT/RESPONDENT: TRADER JOE'S COMPANY, ET AL.	CASE NUMBER: CV-21-005695
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**PROOF OF SERVICE BY FIRST-CLASS MAIL  
NOTICE OF ENTRY OF JUDGMENT OR ORDER**

**(NOTE: You cannot serve the Notice of Entry of Judgment or Order if you are a party in the action. The person who served the notice must complete this proof of service.)**

1. I am at least 18 years old and **not a party to this action**. I am a resident of or employed in the county where the mailing took place, and my residence or business address is (*specify*):  
11132 Ventura Blvd., Los Angeles, CA 91604

2. I served a copy of the *Notice of Entry of Judgment or Order* by enclosing it in a sealed envelope with postage fully prepaid and (*check one*):

- a.  deposited the sealed envelope with the United States Postal Service.
- b.  placed the sealed envelope for collection and processing for mailing, following this business's usual practices, with which I am readily familiar. On the same day correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service.

3. The *Notice of Entry of Judgment or Order* was mailed:

- a. on (*date*): October 8, 2025
- b. from (*city and state*): Los Angeles, CA

4. The envelope was addressed and mailed as follows:

- |  |  |
|--|--|
| <ul style="list-style-type: none"> <li>a. Name of person served:<br/>Kristin Mathis, Esq.<br/>Street address: 19800 MacArthur Blvd., Suite 680<br/>City: Irvine<br/>State and zip code: CA, 92612</li> </ul> | <ul style="list-style-type: none"> <li>c. Name of person served:<br/><br/>Street address:<br/>City:<br/>State and zip code:</li> </ul> |
| <ul style="list-style-type: none"> <li>b. Name of person served:<br/><br/>Street address:<br/>City:<br/>State and zip code:</li> </ul>   | <ul style="list-style-type: none"> <li>d. Name of person served:<br/><br/>Street address:<br/>City:<br/>State and zip code:</li> </ul> |

Names and addresses of additional persons served are attached. (*You may use form POS-030(P).*)

5. Number of pages attached:

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: October 8, 2025

Gerardo Moreno, Esq.  
\_\_\_\_\_  
(TYPE OR PRINT NAME OF DECLARANT)

  
\_\_\_\_\_  
(SIGNATURE OF DECLARANT)

Electronically Filed  
10/8/2025  
Superior Court of California  
County of Stanislaus  
Hugh K. Swift  
Clerk of the Court  
By: Cynthia Hurtado, Deputy

1 Harry Nalbandyan, Esq. (SBN 305116)  
2 Gerardo Moreno, Jr., Esq. (SBN 316983)  
3 **LEVIN & NALBANDYAN, LLP**  
4 11132 Ventura Blvd.,  
5 Los Angeles, CA 91604  
6 Tel: (213) 232-4848  
7 Fax: (213) 232-4849  
8 E-Service: piservice@LNtriallawyers.com

9 Attorney for Plaintiff,  
10 ZAHRA GHARRAEE

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
12 **FOR THE COUNTY OF STANISLAUS**

13 ZAHRA GHARRAEE, an individual,  
14  
15 Plaintiff,

16 vs.

17 TRADER JOE’S COMPANY, a California  
18 Corporation,  
19 Defendant.

Case No.: CV-21-005695

*[Assigned for all purposes to Honorable  
Sonny S. Sandhu, Dept. 24]*

**~~PROPOSED~~ JUDGMENT ON SPECIAL  
VERDICT FORM**

20 This action came on regularly for trial on September 3, 2025, in Department 24, City Towers  
21 Courthouse, Stanislaus County Superior Court, the Honorable Sonny Sandhu, Judge presiding.

22 The Plaintiff ZAHRA GHARRAEE appearing by Harry Nalbandyan, Esq. and Gerardo Moreno,  
23 Jr., Esq. of Levin & Nalbandyan and the Defendant TRADER JOE’S COMPANY, appearing by Kristin  
24 A. Mathis, Esq. and Kevin Place, Esq. of McLean, Vasquez, Place Fabrega and Sebastian E. Kaplan, Esq.  
25 of Kahana Feld LLP.

26 A jury was regularly impaneled and sworn. Witnesses were sworn and testified. After hearing the  
27 evidence and arguments of counsel, the jury was duly instructed by the Court and the case was submitted  
28 to the jury with directions to return a verdict. The jury deliberated on September 30, 2025 beginning  
around 3:00 p.m. and continued deliberating until October 3, 2025 around 9:22 a.m., and thereafter  
returned into Court with its verdict as follows:



1  
2 **QUESTION 1. Was Defendant TRADER JOE’S COMPANY negligent?**

- 3           X     YES  
4           □     NO

5  
6 **QUESTION 2. Was Defendant TRADER JOE’S COMPANY’S negligence a substantial factor in**  
7 **causing harm to Plaintiff ZAHRA GHARRAEE?**

- 8           X     YES  
9           □     NO

10 **QUESTION 3. What are PLAINTIFF ZAHRA GHARRAEE’S total damages? Do not reduce the**  
11 **damages based on the fault, if any, of PLAINTIFF ZAHRA GHARRAEE.**

12

13           a.     Past economic Loss

<b>Total Past Economic Loss</b>	<b><u>\$2,019,716.00</u></b>
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15           b.     Future Economic Loss

<b>Total Future Economic Damages:</b>	<b><u>\$2,789,449.00</u></b>
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18           c.     Past non-economic loss, including physical pain/mental suffering

<b>Total Past Non-Economic Damages:</b>	<b><u>\$5,200,000.00</u></b>
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21           d.     Future non-economic loss, including physical pain/mental suffering

<b>Total Future Non-Economic Damages:</b>	<b><u>\$13,500,000.00</u></b>
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<b>TOTAL DAMAGES:</b>	<b><u>\$23,509,165.00</u></b>
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25  
26 **QUESTION 4. Was PLAINTIFF ZAHRA GHARRAEE negligent?**

- 27           □     YES  
28           X     NO



1 **PROOF OF SERVICE**  
2 **STATE OF CALIFORNIA, COUNTY OF STANISLAUS (CASE NO. CV-21-005695)**

3 I am employed in the County of Los Angeles, State of California. I am over the  
4 age 18 and not a party to the within action. My business address is 11132 Ventura Boulevard, Los  
5 Angeles, CA 91604. On the date stated below, I served the foregoing document(s) described as  
6 **NOTICE OF ENTRY OF JUDGMENT** the interested parties in this action as stated below: **SEE**  
7 **ATTACHED SERVICE LIST.**

8        **BY MAIL.** I am “readily familiar” with Levin & Nalbandyan, LLP’s practice for collecting and  
9 processing correspondence for mailing with the United States Postal Service. Under that practice, it  
10 would be deposited with the United States Postal Service that same day in the ordinary course of  
11 business. Such envelope(s) were placed for collection and mailing with postage thereon fully prepaid at  
12 Los Angeles, California, on that same day following ordinary business practices.

13        **BY OVERNIGHT DELIVERY.** I deposited such document(s) in a box or other facility regularly  
14 maintained by the overnight service carrier, or delivered such document(s) to a courier or a driver  
15 authorized by the overnight service carrier with delivery fees paid or provided for, addressed to the  
16 person(s) being served.

17   **XX**   **BY ELECTRONIC MAIL TRANSMISION.** By electronic mail transmission by transmitting  
18 a PDF format copy of such document(s) to each such person at the email address(es) listed below their  
19 address(es). The document(s) was/were transmitted by electronic transmission and such transmission  
20 was reported as complete and without error.

21        **BY FACSIMILE.** I caused said document(s) to be transmitted by facsimile. The telephone  
22 number of the sending facsimile machine was (213) 232-4849. The facsimile machine I used complied  
23 with California Rules of Court 2.301(3). The name(s) and facsimile machine telephone number(s) of the  
24 person(s) served are set forth in the service list. The document was transmitted by facsimile  
25 transmission, and sending facsimile machine properly issued a transmission report confirming that the  
26 transmission was complete and without error.

27        **BY PERSONAL SERVICE.** By causing delivery of copy(ies) of the document(s) by hand to the  
28 person(s) listed in the service list or to \_\_\_\_\_, a representative of the  
law firm of such person(s). I am exempt from registration as a California process server under Bus. &  
Prof. Code §22350(b).

  **XX**   **STATE.** I declare under penalty of perjury under the laws of the State of California that the  
foregoing is true and correct.

Executed on October 8, 2025 at Los Angeles, California.

Name: Anna M. Contreras

Signature:  \_\_\_\_\_

**SERVICE LIST**

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*Attorney for Plaintiff,*  
**ZAHRA GHARRAEE**

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