

1 TIA KATRINA TARUC CANLAS (SBN: 282063)  
ALIPATO PROJECT  
2 1743 Alcatraz Ave.  
Berkeley, CA 94703  
3 Phone: (510) 393-2723  
Email: tia@alipatoproject.org  
4

5 GLENN KATON (SBN: 281841)  
KATON.LAW  
6 385 Grand Ave., Suite 200  
Oakland, CA 94610  
7 Phone: (510) 463-3350  
Facsimile: (510) 463-3349  
8 Email: gkaton@katon.law

9 Attorneys for Plaintiff  
*Kendra Scott*

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11 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
12 FOR THE COUNTY OF SANTA CRUZ

13 KENDRA SCOTT,  
14 Plaintiff,  
15 vs.  
16 RAYMONDO MCDONALD,  
17 Defendant.  
18  
19  
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Case No.:

COMPLAINT FOR DAMAGES FOR:

- 1) DOMESTIC VIOLENCE;
- 2) STALKING;
- 3) INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS;
- 4) NEGLIGENCE

JURY TRIAL DEMANDED

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22 **NATURE OF ACTION**

23 1. This is a complaint seeking to make Plaintiff KENDRA SCOTT whole from the  
24 beatings and other abuse she suffered at the hands Defendant RAYMONDO MCDONALD.  
25 KENDRA SCOTT brings claims against RAYMONDO MCDONALD for domestic violence (as  
26 a continuing tort) under California Civil Code §1708.6, stalking under California Civil Code  
27 §1708.7, intentional infliction of emotional distress, and negligence.  
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COMPLAINT

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**JURISDICTION AND VENUE**

2. Venue is proper in the County of Santa Cruz because a substantial part of the events, acts, and omissions complained of herein occurred in Santa Cruz County. The amount in controversy exceeds the jurisdictional minimum of this Court.

**PARTIES**

3. Plaintiff KENDRA SCOTT (“Kendra”) is an individual living in Santa Cruz, California.

4. Defendant RAYMONDO MCDONALD (“Ray”) is an individual living in San Jose, California.

**FACTUAL ALLEGATIONS**

5. Kendra and Ray entered into a dating relationship in 2012.

6. During the course of their relationship, Ray physically and emotionally abused Kendra regularly.

7. Kendra and Ray got engaged in February 2014, and moved in together around the same time.

8. Shortly after the parties got engaged, Ray began to abuse Kendra emotionally on an almost daily basis. Examples of this include Ray calling Kendra names like “fucking bitch,” “whore,” “gold digger,” “stupid,” and “idiot.”

9. Kendra documented some of the incidents of Ray’s physical and emotional abuse by reporting them to the police, taking photographs of her injuries, and/or telling her family and friends.

10. On March 7, 2014, when Ray and Kendra were on their way home from a night out in San Francisco, California, Ray jabbed his finger in Kendra’s face. He yelled at Kendra to get out of the car and left her stranded. She walked alone for two hours until Ray decided to pick her up.

1           11.     In May 2014, when Kendra was at a party at The Alibi in Burlingame, California,  
2 Ray arrived, and violently dragged her out of the bar and into his car.

3           12.     On June 29, 2014, Kendra's friend was visiting her. Ray became abusive toward  
4 Kendra and her friend, hit Kendra's friend and dragged Kendra down the stairs of their home.  
5 Kendra fell and hit her head outside on the cement, knocking her unconscious. Ray's assault  
6 caused Kendra bruises on her face and arms.

7           13.     On or about July 14, 2014, Ray beat Kendra severely. He jabbed his finger in  
8 Kendra's face, picked her up, body-slammed her, dragged her body on the floor, and punched  
9 her in the face. She managed to escape and drive to a fast food restaurant where she got napkins  
10 and ice for her face, was bleeding and swollen. Ray's brutal assault gave Kendra a fat lip,  
11 swelling in her eyes and nose, and bruises all over her body.

12           14.     On August 31, 2014, Ray grabbed Kendra by her arms and neck, causing bruising  
13 to both areas. The San Jose Police Department arrested Ray for this assault.

14           15.     On November 30, 2014, when Kendra was five months pregnant, Ray screamed at  
15 Kendra when she asked that he and his friends quiet down because their partying was depriving  
16 her of sleep. This caused Kendra to be admitted to Dominican Hospital in Santa Cruz, California  
17 for bleeding and threatened preterm labor.

18           16.     Kendra decided to end her relationship with Ray permanently when he was  
19 charged with the rape of another woman in December 2014.

20           17.     On February 22, 2015, Kendra had a baby shower. Although they were no longer  
21 together, Ray attended and continued to be abusive. When Kendra's friends and family were  
22 rubbing her pregnant belly, Ray yelled, "get your skanky hands off my son!" He further  
23 embarrassed Kendra by saying vulgar and demeaning things about Kendra like, "oh yeah, I came  
24 all in that pussy, didn't I?"  
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26           18.     On March 26, 2015, Ray and Kendra's son was born.  
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1           19.     On May 25, 2015, with their two-month-old child in Kendra’s arms, Ray pushed  
2 and pulled her violently and repeatedly. That night, Ray was arrested and an Emergency  
3 Protective Order (“EPO”) was issued to protect Kendra from Ray. The EPO mandated that Ray  
4 stay at least 300 yards away from Kendra’s residence.

5           20.     On May 27, 2015, Ray violated an EPO protecting Kendra from him, and police  
6 arrested him for that crime.

7           21.     On February 13, 2016, Ray called Kendra repeatedly, asking to make an uninvited  
8 visit to her home in Santa Cruz. Although Kendra asked Ray to stop calling her, he persisted, and  
9 accused her of being with another man. The accusations and tone in Ray’s voice were  
10 threatening, so Kendra packed her and her son’s things and drove to her mother’s house, even  
11 though it was after midnight. When Kendra and her son were at her mother’s house, Ray called  
12 Kendra and told her, “I know you’re not home because I’m here and you’re not.”

13           22.     On April 12, 2017, during a child custody exchange in Santa Cruz, California,  
14 Ray yelled “You are so fucking stupid,” at Kendra in front of their two-year-old son. Given the  
15 many times that Ray’s threats and insults led to his violence, Kendra feared that Ray’s emotional  
16 abuse would escalate to physical violence.  
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18                                       **FIRST CAUSE OF ACTION**

19                                       (Domestic Violence in Violation of California Civil Code §1708.6)

20           23.     Kendra incorporates and re-alleges each of the allegations set forth above as  
21 though fully set forth herein.

22           24.     On numerous occasions, beginning in or about 2014 and continuing until April 12,  
23 2017, Ray placed Kendra in reasonable apprehension of imminent serious bodily injury to herself,  
24 or another.

25           25.     During the course of their relationship, Ray intentionally or recklessly caused or  
26 attempted to cause bodily injury to Kendra.  
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1 35. On numerous occasions, between 2014 and April 12, 2017, Ray made a credible  
2 threat with the intent to place Kendra in reasonable fear for her safety, or the safety of an  
3 immediate family member.

4 36. Ray's course of conduct caused Kendra to suffer substantial emotional distress.

5 37. On many occasions, Kendra clearly and definitively demanded that Ray cease and  
6 abate his pattern of conduct. However, Ray persisted in said conduct.

7 38. A reasonable person in Kendra's situation would have feared for her safety, or the  
8 safety of an immediate family member.

9 39. A reasonable person in Kendra's situation would suffer substantial emotional  
10 distress.

11 40. As a direct and legal result of Ray's wrongful conduct, Kendra sustained injuries,  
12 causing her general and special damages.

13 41. In committing the acts alleged above, Ray acted with malice, oppression, and in  
14 reckless disregard of Kendra's rights and safety. Ray's conduct warrants an assessment of  
15 punitive damages in an amount sufficient to deter such conduct in the future and in an amount to  
16 be determined according to proof at trial.

17 WHEREFORE, Kendra prays for relief as set forth below.

18 **THIRD CAUSE OF ACTION**

19 (Intentional Infliction of Emotional Distress)

20 42. Kendra incorporates and re-alleges each of the allegations set forth above as  
21 though fully set forth herein.

22 43. Ray's conduct, as set forth above, was outrageous.

23 44. Ray intended and/or acted with reckless disregard to cause Kendra emotional  
24 distress.

25 45. Kendra sustained severe emotional distress.

1 46. Ray's conduct was a substantial factor in causing Kendra's severe emotional  
2 distress.

3 47. In committing the acts alleged above, Ray acted with malice, oppression, and in  
4 reckless disregard of Kendra's rights and safety. Ray's conduct warrants an assessment of  
5 punitive damages in an amount sufficient to deter such conduct in the future and in an amount to  
6 be determined according to proof at trial.  
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8 WHEREFORE, Kendra prays for relief as set forth below.

9 **FOURTH CAUSE OF ACTION**

10 (Negligence)

11 48. Kendra incorporates and re-alleges each of the allegations set forth above as  
12 though fully set forth herein.

13 49. Ray had a duty to refrain from emotionally and physically harming his intimate  
14 partner.

15 50. Ray breached that legal duty.

16 51. As a direct and legal result of Ray's negligence, Kendra sustained injuries. As a  
17 result of these injuries, Kendra suffered general and special damages.

18 WHEREFORE, Kendra prays for relief as set forth below.

19 **PRAYER FOR RELIEF**

20 WHEREFORE, Kendra prays that this Court enter judgment in her favor on every claim  
21 set forth above and award her relief including, but not limited to, the following:

22 Compensatory and general damages in an amount to be proven at trial;

23 Past and future medical, incidental, and services expenses according to proof;

24 Prejudgment and post judgment interest as provided by law;

25 Punitive damages in an amount according to proof or taking some measure to ensure that  
26 an example is made of Ray to deter similar future conduct;

27 Costs of suit incurred herein;

1 Reasonable attorneys' fees pursuant to Civil Code §1708.6(c); and  
2 Such other relief in favor of Kendra as the Court deems just and proper.

3 **JURY DEMAND**

4 KENDRA demands trial by jury on all issues so triable.

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8 DATE

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11 Tia Katrina Taruc Canlas  
12 Attorney for Plaintiff  
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