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10 Attorneys for Plaintiffs JANE DOE 1 AND  
11 JANE DOE 2

12 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
13 COUNTY OF LOS ANGELES, WEST DISTRICT

14  
15 JANE DOE 1, JANE DOE 2,

16 Plaintiffs,

17 v.

18 ROCKIN' HORSE, INC. DBA THE  
RAINBOW BAR & GRILL, AND DOES 1  
19 TO 100, INCLUSIVE,,

20 Defendants.

Case No. 23SMCV03906

COMPLAINT FOR DAMAGES

21  
22 COMES NOW Plaintiffs JANE DOE 1 and JANE DOE 2 for a cause of action against  
23 Defendant ROCKIN' HORSE, INC. d/b/a The Rainbow Bar & Grill, a California corporation, and  
24 DOES 1 through 100, inclusive, and complains and alleges as follows:

25 **GENERAL ALLEGATIONS**

26 1. This lawsuit arises out of Defendant ROCKIN' HORSE, INC. d/b/a The Rainbow  
27 Bar & Grill's negligence in maintaining a safe environment for their female patrons at The Rainbow  
28 Bar & Grill (hereinafter "Rainbow Bar"). Rainbow Bar intentionally created a dangerous,

1 sexualized, and hostile environment for its female patrons. Specifically, Rainbow Bar would give  
2 permission and would knowingly allow Ronald Jeremy Hyatt, known as Ron Jeremy (hereinafter,  
3 “Ron Jeremy”), to use the employee’s restroom to sexually assault female patrons.

4       2.       On or around March 17, 2017, Plaintiffs JANE DOE 1 and JANE DOE 2 were  
5 sexually assaulted by Ron Jeremy at Rainbow Bar & Grill (hereinafter “Subject Assaults”).

6       3.       Ron Jeremy’s conduct during the Subject Assaults was done in violation of Penal  
7 Code 234.4.

8       4.       Prior to Plaintiffs JANE DOE 1 and JANE DOE 2’s Subject Assaults, Rainbow Bar  
9 & Grill was aware of multiple other sexual assaults committed by Ron Jeremy in violation of  
10 California Penal Code 234.4 at their establishment, however continued to facilitate and ratify his  
11 illegal behavior.

12       5.       Accordingly, Plaintiffs JANE DOE 1 and JANE DOE 2 claims are brought pursuant  
13 to California Code of Civil Procedure 340.16.

14       6.       Plaintiff JANE DOE 1 is, and at all times herein mentioned was, an individual  
15 residing in the State of California.

16       7.       Plaintiff JANE DOE 2 is, and at all times herein mentioned was, an individual  
17 residing in the State of California.

18       8.       At all times mentioned herein, Defendant ROCKIN’ HORSE, INC. d/b/a The  
19 Rainbow Bar & Grill was and is a corporation organized and existing under and by virtue of the  
20 laws of the State of California and is authorized to do, and is doing, business in the State of  
21 California, County of Los Angeles.

22       9.       At all times relevant herein, The Rainbow Bar & Grill, located at 9015 Sunset Blvd.,  
23 West Hollywood, CA 90069, is a bar and restaurant owned and operated by ROCKIN’ HORSE,  
24 INC. and is where the Subject Assaults took place.

25       10.      The true names and capacities, whether individual, plural, corporate, partnership,  
26 associate, or otherwise, of DOES 1 through 50, inclusive, are unknown to Plaintiffs JANE DOE 1  
27 and JANE DOE 2 who therefore sue said Defendants by such fictitious names. The full extent of  
28 the facts linking such fictitiously sued Defendants is unknown to Plaintiffs. Plaintiffs JANE DOE

1 1 and JANE DOE 2 are informed and believe, and thereon allege, that each of the Defendants  
2 designated herein as a DOE was, and is, negligent, or in some other actionable manner, responsible  
3 for the events and happenings hereinafter referred to, and thereby negligently, or in some other  
4 actionable manner, legally and proximately caused the hereinafter described injuries and damages  
5 to Plaintiffs JANE DOE 1 and JANE DOE 2. Plaintiffs JANE DOE 1 and JANE DOE 2 will  
6 hereafter seek leave of the Court to amend this Complaint to show the Defendants' true names and  
7 capacities after the same have been ascertained.

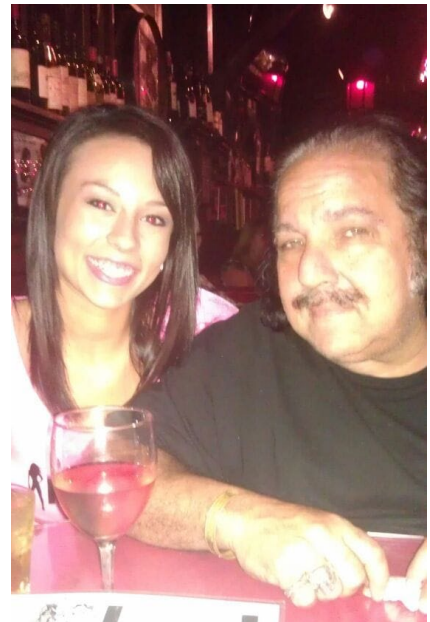
8 **FACTUAL ALLEGATIONS**

9 11. Ron Jeremy is a well-known pornographic  
10 actor. Ron Jeremy was a popular regular at the Rainbow Bar  
11 and Grill.

12 12. Rainbow Bar and Grill's Yelp Page has over  
13 1,000 customer reviews, with over 50 reviews mentioning  
14 Ron Jeremy and him being a "regular" at the bar.  
15 Additionally, Rainbow Bar and Grill's Yelp page and other  
16 social media pages have multiple photos of Ron Jeremy with  
17 patrons at the Rainbow Bar & Grill.

18 13. Rainbow Bar and Grill employees would give  
19 permission and would knowingly allow Ron Jeremy to use the  
20 employee's restroom to sexually assault female patrons.

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Photographs of Ron  
Jeremy with Patrons On  
Rainbow Bar's Yelp Page

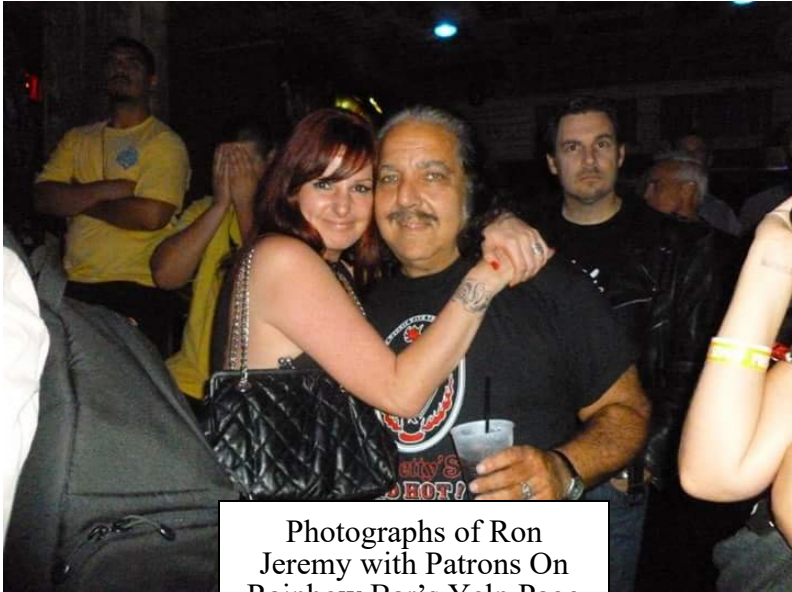


Photographs of Ron Jeremy with Patrons On Rainbow Bar's Yelp Page

14. Leading up to the Subject Assaults, Ron Jeremy was known to sexually assault women at Rainbow Bar. In fact, Emily J. Sullivan, a former employee at Rainbow Bar, has publicly stated “[Ron Jeremy] was there so frequently and so often that the people that worked there knew him well, and he was able to use his knowledge

of the people that worked there and his knowledge of that restaurant to help him to commit the sexual assaults.”

15. On August 19, 2021, Ron Jeremy was indicted with more than 30 counts of sexual assault. The transcript from the Grand Jury proceedings mentions at least 5 sexual assaults that took place at the Rainbow Bar & Grill.



Photographs of Ron Jeremy with Patrons On Rainbow Bar's Yelp Page

16. One woman (referred to as Jane Doe 4 in the Grand Jury transcript) testified that Ron Jeremy raped her in the bathroom of the Rainbow Bar. Video evidence corroborated Ron Jeremy entering the bathroom with the woman. Ron Jeremy admitted to having taken nude photos of the woman in the bathroom, however he denied the rape accusations.

17. Another woman (referred to as Jane Doe 10 in the Grand Jury transcript) testified, she met Ron Jeremy at Rainbow Bar where he bought and handed her a drink, and that after drinking it she immediately became sick and discombobulated. The woman started throwing up profusely. Ron Jeremy followed her to the restroom, told her that the bar was closing, took her to his home that

1 night, and sexually assaulted her.

2 18. Unfortunately, Jane Doe 10 was not the only woman to be drugged at Rainbow Bar  
3 after encountering Ron Jeremy. In fact, Rainbow Bar, employees would facilitate Ron Jeremy  
4 drugging women's drinks. One woman (referred to as Jane Doe 9 in the Grand Jury transcript) met  
5 Ron Jeremy at Rainbow Bar. Ron Jeremy then told the bartender to "get her the Ron Jeremy special."  
6 After having consumed the drink, she felt "like out of it, like dizziness. Kind of like sedated." She  
7 allegedly told Ron Jeremy she was not feeling well and needed to go to the bathroom, and he said  
8 that he would take her to the VIP bathroom. While there, he orally copulated and then penetrated  
9 her. She told him "No," but she "felt weightless" and like she "couldn't move her arms."

10 19. One woman (referred to as Jane Doe 2 in the Grand Jury transcript) testified she was  
11 assaulted by Ron Jeremy at Rainbow Bar while her husband waited for her. She was with her  
12 husband at Rainbow Bar when she met Ron Jeremy. She wanted to use the bathroom but was told  
13 that they were inaccessible because it was near closing time. Ron Jeremy told her he knew of a  
14 bathroom she could use. Ron Jeremy then proceeded to follow her into the bathroom and watched  
15 her urinate. Then he pressed his penis and buttocks against her vagina. She was afraid. She protested  
16 and told Ron Jeremy, "I just need to leave. My husband's waiting. He probably wonders where I  
17 am...I'm just a mom. I have kids at home."

18 20. JANE DOE 1 and JANE DOE 2 were two victims of Ron Jeremy at the Rainbow  
19 Bar. On or about March 17, 2017 the duo went to Rainbow Bar, and within 10 minutes of their  
20 arrival, met Ron Jeremy who proceeded to target them the remainder of the evening.

21 21. Ron Jeremy bought JANE DOE 1 and JANE DOE 2 a few drinks, lingered around  
22 them, offered to take pictures with them, and tried making conversation with them.

23 22. Ron Jeremy first attempted to get JANE DOE 1 and JANE DOE 2 to make out, but  
24 they declined. On another occasion that evening, Ron Jeremy approached JANE DOE 1 and said,  
25 "let me show you something, something cool" and proceeded to stick his hand on her lower back  
26 and quickly slide it down to her butt, under her underwear, putting his fingers a quarter of an inch  
27 to half an inch inside her private areas, all without her consent and despite her objections. JANE  
28 DOE 1 was mortified and violated, and immediately sought refuge from Ron Jeremy.





1           29.     This duty included the duty to act with reasonable care and provide protection to their  
2 patrons, particularly, Defendant ROCKIN' HORSE, INC. had a duty to exercise reasonable care to  
3 protect their patrons from injury at the hands of fellow guests. *Delgado v. Trax Bar & Grill* (2005)  
4 36 Cal.4th 224

5           30.     Plaintiffs JANE DOE 1 and JANE DOE 2 are informed and believe, and thereon  
6 allege, that at all times mentioned herein, Defendant ROCKIN' HORSE, INC. and DOES 1 through  
7 100, inclusive, and each of them, failed in their duty to protect their patrons from injury at the hands  
8 of fellow guests.

9           31.     Defendant ROCKIN' HORSE, INC. and DOES 1 through 100, inclusive, knowingly  
10 allowed a sexual predator into their bar time and time again and allowed him a dungeon, the  
11 employee's restroom, for committing heinous sexual acts against Defendant's female patrons.

12           32.     Plaintiffs JANE DOE 1 and JANE DOE 2 are informed and believe, and thereon  
13 allege, that the aforementioned negligent actions of the Defendants' agents, employees, servants  
14 and/or independent contractors, by Defendant ROCKIN' HORSE, INC. and DOES 1 through 100,  
15 inclusive, and each of them, directly, legally and proximately caused the injuries and damages  
16 Plaintiffs JANE DOE 1 and JANE DOE 2 suffered including being sexually assaulted by Ron  
17 Jeremy.

18           33.     As a legal, direct and proximate result of the aforementioned conduct of Defendant  
19 ROCKIN' HORSE, INC. and DOES 1 through 100, inclusive and each of them, Plaintiffs JANE  
20 DOE 1 and JANE DOE 2 has been injured and hurt in their health, strength and activity, sustaining  
21 serious injuries to their body, and shock and injury to their nervous systems and persons, all of which  
22 said injuries have caused and continue to cause Plaintiffs JANE DOE 1 and JANE DOE 2 great  
23 physical and mental pain and suffering. Plaintiffs JANE DOE 1 and JANE DOE 2 are further  
24 informed and believe, and thereon allege, that said injured will result in some or all permanent  
25 disability to them all to their general damages in an amount which will be stated according to proof,  
26 pursuant to California *Code of Civil Procedure* Section 425.10.

27           34.     As a legal, direct and proximate result of the aforementioned conduct of the  
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Defendant ROCKIN’ HORSE, INC. and DOES 1 through 100, inclusive, and each of them, Plaintiffs JANE DOE 1 and JANE DOE 2 have been compelled to and will continue to employ the services of hospitals, physicians, surgeons, nurses and the like, to care for and treat her, and incurred hospital, medical, professional and incidental expenses, and Plaintiffs JANE DOE 1 and JANE DOE 2 are informed and believe, and thereon allege, that by reason of their injuries, will necessarily incur additional like expenses for an indefinite period of time in the future, the exact amount of which expenses will be stated according to proof, pursuant to California *Code of Civil Procedure* Section 425.10.


**PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiffs JANE DOE 1 and JANE DOE 2 pray judgment against all Defendants as follows:

- 1. For general damages (also known as non-economic damages), including but not limited to, past and future pain and suffering, in an amount in excess of the jurisdictional minimum, according to proof;
- 2. For special damages (also known as economic damages), including but not limited to past and future hospital, medical, professional, and incidental expenses as well as past and future loss of earnings, loss of opportunity, and loss of earning capacity, in excess of the jurisdictional minimum, according to proof;
- 3. For prejudgment interest, according to proof;
- 4. For costs of suit incurred herein, according to proof;
- 5. For such other and further relief as the Court may deem just and proper.

DATED: August 18, 2023

PANISH | SHEA | BOYLE | RAVIPUDI LLP

By:   
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 Nadine Khedry  
 Attorneys for Plaintiffs

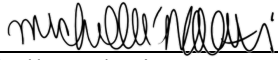


1 DATED: August 18, 2023

NABATI LAW, PC

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By:   
Michelle Nabati  
Attorneys for Plaintiffs

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**DEMAND FOR JURY TRIAL**

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Plaintiffs JANE DOE 1 and JANE DOE 2 hereby demand a trial by jury as to all causes of  
8 action.


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10 DATED: August 18, 2023

PANISH | SHEA | BOYLE | RAVIPUDI LLP

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By:   
Nadine Khedry  
Attorneys for Plaintiffs

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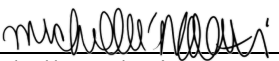
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15 DATED: August 18, 2023

NABATI LAW, PC

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By:   
Michelle Nabati  
Attorneys for Plaintiffs

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