

FILED
LOS ANGELES SUPERIOR COURT

DEC 01 2011

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8 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT**

10 **DAVID COPPEDGE**, an individual;
11
12 Plaintiff,

13 vs.

14 **JET PROPULSION LABORATORY**, form
15 unknown; **CALIFORNIA INSTITUTE OF**
16 **TECHNOLOGY**, form unknown; **GREGO-**
17 **RY CHIN**, an Individual; **CLARK A.**
18 **BURGESS**, an Individual; **KEVIN KLENK**,
19 an Individual; and **Does 1** through **25**, inclu-
20 sive,

21 Defendants.

Case No. BC435600

The Honorable Ernest M. Hiroshige, Dept. 54

**PLAINTIFF DAVID COPPEDGE'S
PROPOSED SPECIALLY-PREPARED
JURY INSTRUCTION NO. 2: GOOD
CAUSE TO TERMINATE**

FSC: December 2, 2011
HEARING TIME: 8:30 a.m.
DEPT: 54

Trial Date: December 14, 2011

BY FAX

22 You must determine whether Defendant had good cause to terminate Plaintiff. To make
23 that determination, you must find that (1) Defendant acted with "good faith" in making its termi-
24 nation decision; (2) Defendant's investigation was appropriate under the circumstances; and (3)
25 Defendant had reasonable grounds for believing Plaintiff engaged in alleged misconduct, i.e.,
26 harassment under Defendant's policy and violation of Defendant's ethic's policy.

27 Sources: Silva v. Lucky Stores, Inc. (1998) 65 Cal.App.4th 256, 264, following Cotran v. Rollins
28 Hudig Hall Internat., Inc. (1998) 17 Cal.4th 93, 109.

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DATED: November 30, 2011

THE BECKER LAW FIRM

William J
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Digitally signed by William J Becker Jr,
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By:

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Attorneys for Plaintiff, DAVID COPPEDGE