

The complaint was filed on **February 6, 2014**, well more than one year after the alleged wrongful inspections,¹ well more than one year after Hanh Hoang sold her salon,² and well more than one year after Hanh Hoang entered into consent agreements disposing of the violations asserted against her, supposedly under pressure.³ The claims asserted by Hanh Hoang are untimely and prescribed.

Factual Background:

The deposition of Hanh Hoang has been taken, and therein Hanh Hoang confirmed the key facts and dates set forth in the table below. In examining this table, it should be noted that the brother-in-law of Hanh Hoang's is Anh "Joseph" Cao, the attorney for the plaintiffs in this case.⁴

2010	Hanh Hoang bought and opened Aloha Nails #2. (Exhibit 1 – Hanh Hoang dep. at 13-14 and 207).
From opening until May 1, 2012	<p>At the first inspection of Aloha Nails #2, the inspector was "nice to me." (Exhibit 2 at p. 6, answer to interrogatory no. 17). As stated by Hanh Hoang in this answer:</p> <p style="padding-left: 40px;">She [inspector] insinuated that (if I take care of her, that she would take care of me.) She came back at least twice a year or maybe more times to inspect my store. Her attitude totally changed after her first visit to my salon. I believed that because I ignored her remarks about her taking care of me if I take care of her. (I think she was trying to get me to bribe her) <i>Id.</i></p> <p>Hanh Hoang alleges in her complaint that she "has been subjected to numerous inspections since the opening of her store which she believes were made predominantly, if not solely, because she is Vietnamese." (R. Doc. 1 at para. 9) Hanh Hoang claims that she called the board during her second year of operation and complained about the number of inspections. (Exhibit 1 at 141-42).</p>

¹ The primary inspection of which Hanh Hoang complains occurred on May 1, 2012, as documented *infra*. See R. Doc. 1, para. 23. She also complains about the "numerous" inspections before May 1, 2012. *Id.*, para. 23.

² Hanh Hoang sold her salon on September 1, 2012, as documented *infra*.

³ Hanh Hoang signed the consent agreements on October 23, 2012, as documented *infra*.

⁴ Exhibit 1 at 56.