

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): LAW OFFICE OF ED K. BASSEY (SBN 146740) 309 SOUTH A STREET OXNARD, CA 93030 TELEPHONE NO.: 805-487-8689 FAX NO. (Optional): 805-486-8868 E-MAIL ADDRESS (Optional): BASSEY ED@YAHOO.COM ATTORNEY FOR (Name): GENE DUCOS: INAH DUCOS	VENTURA SUPERIOR COURT OCT 13 2020 FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF VENTURA STREET ADDRESS: 800 SOUTH VICTORIA AVE. MAILING ADDRESS: 800 SOUTH VICTORIA AVE. CITY AND ZIP CODE: VENTURA, CA 93009 BRANCH NAME: VENTURA SUPERIOR COURT	
PLAINTIFF: GENE DUCOS: INAH DUCOS DEFENDANT: THOMAS STEPHEN VALENTINO <input checked="" type="checkbox"/> DOES 1 TO 10	
COMPLAINT—Personal Injury, Property Damage, Wrongful Death <input type="checkbox"/> AMENDED (Number): Type (check all that apply): <input checked="" type="checkbox"/> MOTOR VEHICLE <input type="checkbox"/> OTHER (specify): <input checked="" type="checkbox"/> Property Damage <input type="checkbox"/> Wrongful Death <input checked="" type="checkbox"/> Personal Injury <input type="checkbox"/> Other Damages (specify): Jurisdiction (check all that apply): <input type="checkbox"/> ACTION IS A LIMITED CIVIL CASE Amount demanded <input type="checkbox"/> does not exceed \$10,000 <input type="checkbox"/> exceeds \$10,000, but does not exceed \$25,000 <input checked="" type="checkbox"/> ACTION IS AN UNLIMITED CIVIL CASE (exceeds \$25,000) <input type="checkbox"/> ACTION IS RECLASSIFIED by this amended complaint <input type="checkbox"/> from limited to unlimited <input type="checkbox"/> from unlimited to limited	CASE NUMBER:

1. **Plaintiff** (name or names): GENE DUCOS; INAH DUCOS
 alleges causes of action against **defendant** (name or names):
 THOMAS STEPHEN VALENTINO
 2. This pleading, including attachments and exhibits, consists of the following number of pages: 5
 3. Each plaintiff named above is a competent adult
 - a. **except** plaintiff (name):
 - (1) a corporation qualified to do business in California
 - (2) an unincorporated entity (describe):
 - (3) a public entity (describe):
 - (4) a minor an adult
 - (a) for whom a guardian or conservator of the estate or a guardian ad litem has been appointed
 - (b) other (specify):
 - (5) other (specify):
 - b. **except** plaintiff (name):
 - (1) a corporation qualified to do business in California
 - (2) an unincorporated entity (describe):
 - (3) a public entity (describe):
 - (4) a minor an adult
 - (a) for whom a guardian or conservator of the estate or a guardian ad litem has been appointed
 - (b) other (specify):
 - (5) other (specify):
- Information about additional plaintiffs who are not competent adults is shown in Attachment 3.

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CV

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4. Plaintiff (*name*):
 is doing business under the fictitious name (*specify*):

and has complied with the fictitious business name laws.

5. Each defendant named above is a natural person

a. **except** defendant (*name*):

(1) a business organization, form unknown

(2) a corporation

(3) an unincorporated entity (*describe*):

(4) a public entity (*describe*):

(5) other (*specify*):

c. **except** defendant (*name*):

(1) a business organization, form unknown

(2) a corporation

(3) an unincorporated entity (*describe*):

(4) a public entity (*describe*):

(5) other (*specify*):

b. **except** defendant (*name*):

(1) a business organization, form unknown

(2) a corporation

(3) an unincorporated entity (*describe*):

(4) a public entity (*describe*):

(5) other (*specify*):

d. **except** defendant (*name*):

(1) a business organization, form unknown

(2) a corporation

(3) an unincorporated entity (*describe*):

(4) a public entity (*describe*):

(5) other (*specify*):

Information about additional defendants who are not natural persons is contained in Attachment 5.

6. The true names of defendants sued as Does are unknown to plaintiff.

a. Doe defendants (*specify Doe numbers*): _____ were the agents or employees of other named defendants and acted within the scope of that agency or employment.

b. Doe defendants (*specify Doe numbers*): _____ are persons whose capacities are unknown to plaintiff.

7. Defendants who are joined under Code of Civil Procedure section 382 are (*names*):

8. This court is the proper court because

a. at least one defendant now resides in its jurisdictional area.

b. the principal place of business of a defendant corporation or unincorporated association is in its jurisdictional area.

c. injury to person or damage to personal property occurred in its jurisdictional area.

d. other (*specify*):

9. Plaintiff is required to comply with a claims statute, and

a. has complied with applicable claims statutes, or

b. is excused from complying because (*specify*):

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10. The following causes of action are attached and the statements above apply to each (each complaint must have one or more causes of action attached):

- a. Motor Vehicle
- b. General Negligence
- c. Intentional Tort
- d. Products Liability
- e. Premises Liability
- f. other (specify):

11. Plaintiff has suffered

- a. wage loss
- b. loss of use of property
- c. hospital and medical expenses
- d. general damage
- e. property damage
- f. loss of earning capacity
- g. other damage (specify):

12. The damages claimed for wrongful death and the relationships of plaintiff to the deceased are

- a. listed in Attachment 12.
- b. as follows:

13. The relief sought in this complaint is within the jurisdiction of this court.

14. Plaintiff prays for judgment for costs of suit; for such relief as is fair, just, and equitable; and for

- a. (1) compensatory damages
- (2) punitive damages

The amount of damages is (in cases for personal injury or wrongful death, you must check (1)):

- (1) according to proof
- (2) in the amount of: \$

15. The paragraphs of this complaint alleged on information and belief are as follows (specify paragraph numbers):

Date: OCTOBER 9, 2020

ED K. BASSEY
(TYPE OR PRINT NAME)


(SIGNATURE OF PLAINTIFF OR ATTORNEY)

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SECOND _____ CAUSE OF ACTION—General Negligence Page 4
 (number)

ATTACHMENT TO Complaint Cross-Complaint
 (Use a separate cause of action form for each cause of action.)

GN-1. Plaintiff (name): GENE DUCOS; INAH DUCOS

alleges that defendant (name): THOMAS STEPHEN VALENTINO

Does 1 _____ to 10 _____

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant negligently caused the damage to plaintiff

on (date): 11/21/2018

at (place): OXNARD, CALIFORNIA

(description of reasons for liability):

ON SAID DATE TIME AND PLACE, DEFENDANT, AND EACH OF THEM, DIRECTED, CONTROLLED AND OPERATED THEIR VEHICLE SO CARELESSLY THAT IT CAUSED THE INJURIES AND DAMAGES THAT PLAINTIFFS ARE COMPLAINING OF.

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FIRST _____ **CAUSE OF ACTION—Motor Vehicle**
 (number)

ATTACHMENT TO Complaint Cross - Complaint

(Use a separate cause of action form for each cause of action.)

Plaintiff (name): GENE DUCOS; INAH DUCOS

MV- 1. Plaintiff alleges the acts of defendants were negligent; the acts were the legal (proximate) cause of injuries and damages to plaintiff; the acts occurred on (date): 11/21/2018 at (place): OXNARD, CALIFORNIA

MV- 2. DEFENDANTS

- a. The defendants who operated a motor vehicle are (names):
 THOMAS STEPHEN VALENTINO

- Does 1 _____ to 10 _____
- b. The defendants who employed the persons who operated a motor vehicle in the course of their employment are (names):
 THOMAS STEPHEN VALENTINO

- Does 1 _____ to 10 _____
- c. The defendants who owned the motor vehicle which was operated with their permission are (names):
 THOMAS STEPHEN VALENTINO

- Does 1 _____ to 10 _____
- d. The defendants who entrusted the motor vehicle are (names):
 THOMAS STEPHEN VALENTINO

- Does 1 _____ to 10 _____
- e. The defendants who were the agents and employees of the other defendants and acted within the scope of the agency were (names):
 THOMAS STEPHEN VALENTINO

- Does 1 _____ to 10 _____
- f. The defendants who are liable to plaintiffs for other reasons and the reasons for the liability are
 listed in Attachment MV-2f as follows:
 THOMAS STEPHEN VALENTINO

Does 1 _____ to 10 _____

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