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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): 1 to 25 _____ 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 1, 2020

Mark D. Licker

(TYPE OR PRINT NAME)



(SIGNATURE OF PLAINTIFF OR ATTORNEY)

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1 **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): Angelica Estrada

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): October 8, 2018

at (place):

Tierra Rejada Road and Courtney Lane, Moorpark, CA 93021 - County of Ventura

MV- 2. DEFENDANTS

a. The defendants who operated a motor vehicle are (names):
 Jonathan Conrad Walgren

Does 1 to 5

b. The defendants who employed the persons who operated a motor vehicle in the course of their employment are (names):

Does 6 to 10

c. The defendants who owned the motor vehicle which was operated with their permission are (names):

Does 11 to 15

d. The defendants who entrusted the motor vehicle are (names):

Does 16 to 20

e. The defendants who were the agents and employees of the other defendants and acted within the scope of the agency were (names):

Does 21 to 25

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:

Does _____ to _____

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2 **CAUSE OF ACTION—General Negligence** Page 5
 (number)

ATTACHMENT TO Complaint Cross-Complaint

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

GN-1. Plaintiff (name): Angelica Estrada

alleges that defendant (name): Jonathan Conrad Walgren

Does 1 to 25

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): October 8, 2018

at (place): Tierra Rejada Road and Courtney Lane, Moorpark, CA 93021 - County of Ventura

(description of reasons for liability):

Plaintiff, Angelica Estrada was traveling northbound on Tierra Rejada Road approaching the intersection with Courtney Lane. Defendant, Jonathan Conrad Walgren was attempting to turn left from the stop sign at Tierra Rejada Road and westbound Courtney Lane onto southbound Tierra Rejada Road. Defendant negligently proceeded into Plaintiff's lane of travel when her vehicle was an imminent hazard, causing a collision.