

OCT 09 2020

PLD-PI-001

<p>ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): David K. Cohn (SBN: 68768) Doug Fitz-Simmon (SBN: 128338) CHAIN COHN STILES 1731 Chester Avenue Bakersfield, CA 93301</p> <p>TELEPHONE NO (661) 323-4000 FAX NO. (Optional): (661) 324-1352 E-MAIL ADDRESS (Optional) dcohn@chainlaw.com ATTORNEY FOR (Name): Bruce George, Andrew George, Nicholas George, Brooke George</p>	<p>FOR COURT USE ONLY</p>
<p>SUPERIOR COURT OF CALIFORNIA, COUNTY OF VENTURA STREET ADDRESS: 800 South Victoria Avenue MAILING ADDRESS CITY AND ZIP CODE Ventura 93009 BRANCH NAME:</p>	
<p>PLAINTIFF: Bruce George; Andrew George; Nicholas George; and Brooke George DEFENDANT: Sharon Yvonne Tettegah; and, <input checked="" type="checkbox"/> DOES 1 TO <u>50</u></p>	
<p>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 type="checkbox"/> Property Damage <input type="checkbox"/> Wrongful Death <input checked="" type="checkbox"/> Personal Injury <input checked="" type="checkbox"/> Other Damages (specify): Dillon v. Legg</p>	
<p>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</p>	<p>CASE NUMBER:</p>

1. Plaintiff (name or names): Bruce George; Andrew George; Nicholas George; Brooke George
alleges causes of action against defendant (name or names): Sharon Yvonne Tettegah; and, DOES 1 to 50

2. This pleading, including attachments and exhibits, consists of the following number of pages: 11

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.

JF

SHORT TITLE: <p style="text-align: center; margin-top: 10px;">Bruce George, et al. v Tettegah, et al.</p>	CASE NUMBER:
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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*): DOES 1 to 10
 (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*): DOES 21 to 30
 (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*): DOES 11 to 20
 (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*): 1-50 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*): 1-50 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*):

SHORT TITLE Bruce George, et al. v. Lettegah, et al.	CASE NUMBER
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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):
Dillon v Legg

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. \$

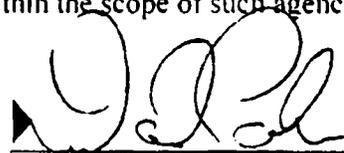
15. The paragraphs of this complaint alleged on information and belief are as follows (specify paragraph numbers):

5a; 5b; 5c; 15: At all times mentioned herein, Defendants, and each of them, were agents and employees of each of the remaining Defendants, and acted within the scope of such agency and employment.

Date: October 9, 2020

David K. Cohn

(TYPE OR PRINT NAME)



(SIGNATURE OF PLAINTIFF OR ATTORNEY)

SHORT TITLE: <p style="text-align: center;">Bruce George, et al. v Tettegah, et al.</p>	CASE NUMBER:
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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): Bruce George

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): June 13, 2020

at (place): SR-126, 833 feet east of Atmore Road, County of Ventura, State of California. At said time and place, Defendants, and each of them, did negligently and carelessly own, rent, lease, bail, operate, control, repair, maintain and entrust that certain 2013 Mercedes so as to cause same to collide with the vehicle operated by Plaintiff Bruce George, thereby directly and proximately causing the damages complained of herein to Plaintiff.

MV- 2. DEFENDANTS

a. The defendants who operated a motor vehicle are (names): Sharon Yvonne Tettegah; and,

Does 1 to 50

b. The defendants who employed the persons who operated a motor vehicle in the course of their employment are (names): Sharon Yvonne Tettegah; and,

Does 1 to 50

c. The defendants who owned the motor vehicle which was operated with their permission are (names): Sharon Yvonne Tettegah; and,

Does 1 to 50

d. The defendants who entrusted the motor vehicle are (names): Sharon Yvonne Tettegah; and,

Does 1 to 50

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

Does 1 to 50

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 _____

SHORT TITLE <p style="text-align: center;">Bruce George, et al. v Tettegah, et al.</p>	CASE NUMBER:
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ATTACHMENT (Number): MV-1

(This Attachment may be used with any Judicial Council form.)

At all times mentioned herein, Plaintiff, Bruce George, was and is the natural father of Plaintiff Andrew George and Plaintiff Nicholas George.

As a direct and proximate result of the conduct of defendants, and each of them, as aforeseaid, Plaintiff Bruce George witnessed the serious personal injuries sustained by his sons, and as a result of witnessing the serious personal injuries to his sons, Plaintiff, Bruce George, has received severe personal injuries and sustained great pain and suffering, all to his general damage.

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page 5 of
(Add pages as required)

SHORT TITLE: <p style="text-align: center;">Bruce George, et al. v Tettegah, et al.</p>	CASE NUMBER:
--	--------------

SECOND 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): Andrew George

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): June 13, 2020

at (place): SR-126, 833 feet east of Atmore Road, County of Ventura, State of California. At said time and place, Defendants, and each of them, did negligently and carelessly own, rent, lease, bail, operate, control, repair, maintain and entrust that certain 2013 Mercedes so as to cause same to collide with the vehicle in which Plaintiff Andrew George was a passenger, thereby directly and proximately causing the damages complained of herein to Plaintiff.

MV- 2. DEFENDANTS

a. The defendants who operated a motor vehicle are (names): Sharon Yvonne Tettegah; and,

Does 1 to 50

b. The defendants who employed the persons who operated a motor vehicle in the course of their employment are (names): Sharon Yvonne Tettegah; and,

Does 1 to 50

c. The defendants who owned the motor vehicle which was operated with their permission are (names): Sharon Yvonne Tettegah; and,

Does 1 to 50

d. The defendants who entrusted the motor vehicle are (names): Sharon Yvonne Tettegah; and,

Does 1 to 50

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

Does 1 to 50

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 _____

SHORT TITLE: Bruce George, et al. v Tettegah, et al.	CASE NUMBER:
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ATTACHMENT (Number): MV-1*(This Attachment may be used with any Judicial Council form.)*

At all times mentioned herein, Plaintiff, Andrew George, was and is the natural son of Plaintiff Bruce George, the natural brother of Plaintiff Nicholas George and the lawful husband of Plaintiff Brooke George.

As a direct and proximate result of the conduct of defendants, and each of them, as aforeseaid, Plaintiff Andrew George witnessed the serious personal injuries sustained by his father, brother and wife, and as a result of witnessing the serious personal injuries to said individuals, Plaintiff, Andrew George, has received severe personal injuries and sustained great pain and suffering, all to his general damage.

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page 7 of _____
(Add pages as required)

SHORT TITLE: <p style="text-align: center;">Bruce George, et al. v Tettegah, et al.</p>	CASE NUMBER:
--	--------------

THIRD 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): Nicholas George

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): June 13, 2020

at (place): SR-126, 833 feet east of Atmore Road, County of Ventura, State of California. At said time and place, Defendants, and each of them, did negligently and carelessly own, rent, lease, bail, operate, control, repair, maintain and entrust that certain 2013 Mercedes so as to cause same to collide with the vehicle in which Plaintiff Nicholas George was a passenger, thereby directly and proximately causing the damages complained of herein to Plaintiff.

MV- 2. DEFENDANTS

a. The defendants who operated a motor vehicle are (names): Sharon Yvonne Tettegah; and,

Does 1 to 50

b. The defendants who employed the persons who operated a motor vehicle in the course of their employment are (names): Sharon Yvonne Tettegah; and,

Does 1 to 50

c. The defendants who owned the motor vehicle which was operated with their permission are (names): Sharon Yvonne Tettegah; and,

Does 1 to 50

d. The defendants who entrusted the motor vehicle are (names): Sharon Yvonne Tettegah; and,

Does 1 to 50

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

Does 1 to 50

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 _____

SHORT TITLE Bruce George, et al. v Tettegah, et al.	CASE NUMBER
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ATTACHMENT (Number): MV-1*(This Attachment may be used with any Judicial Council form.)*

At all times mentioned herein, Plaintiff, Nicholas George, was and is the natural son of Plaintiff Bruce George and the natural brother of Plaintiff Andrew George.

As a direct and proximate result of the conduct of defendants, and each of them, as aforeseaid, Plaintiff Nicholas George witnessed the serious personal injuries sustained by his father and brother, and as a result of witnessing the serious personal injuries to said individuals, Plaintiff, Nicholas George, has received severe personal injuries and sustained great pain and suffering, all to his general damage.

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page 9 of _____
(Add pages as required)

SHORT TITLE:

Bruce George, et al. v Tettegah, et al.

CASE NUMBER:

FOURTH

(number)

CAUSE OF ACTION—Motor Vehicle

ATTACHMENT TO Complaint Cross - Complaint

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

Plaintiff (name): Brooke George

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): June 13, 2020

at (place): SR-126, 833 feet east of Atmore Road, County of Ventura, State of California. At said time and place, Defendants, and each of them, did negligently and carelessly own, rent, lease, bail, operate, control, repair, maintain and entrust that certain 2013 Mercedes so as to cause same to collide with the vehicle in which Plaintiff Brooke George was a passenger, thereby directly and proximately causing the damages complained of herein to Plaintiff.

MV- 2. DEFENDANTS

a. The defendants who operated a motor vehicle are (names): Sharon Yvonne Tettegah; and,

Does 1 to 50

b. The defendants who employed the persons who operated a motor vehicle in the course of their employment are (names): Sharon Yvonne Tettegah; and,

Does 1 to 50

c. The defendants who owned the motor vehicle which was operated with their permission are (names): Sharon Yvonne Tettegah; and,

Does 1 to 50

d. The defendants who entrusted the motor vehicle are (names): Sharon Yvonne Tettegah; and,

Does 1 to 50

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

Does 1 to 50

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 _____

Page 10

SHORT TITLE Bruce George, et al. v Tettegah, et al.	CASE NUMBER
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ATTACHMENT (Number) MV-1*(This Attachment may be used with any Judicial Council form.)*

At all times mentioned herein, Plaintiff, Brooke George, was and is the lawful wife of Plaintiff Andrew George.

As a direct and proximate result of the conduct of defendants, and each of them, as aforeseaid, Plaintiff Brooke George witnessed the serious personal injuries sustained by husband, and as a result of witnessing the serious personal injuries to her husband, Plaintiff, Brooke George, has received severe personal injuries and sustained great pain and suffering, all to her general damage.

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page 11 of _____
(Add pages as required)