

RECEIVED FOR SCANNING
VENTURA SUPERIOR COURT

PLD-PI-001

<p>ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): PEJMAN RAHNAMA, ESQ. (SBN: 176504)</p> <p>LAW OFFICES OF PEYMAN & RAHNAMA 11801 W. WASHINGTON BOULEVARD LOS ANGELES, CALIFORNIA 90066</p> <p>TELEPHONE NO: (310) 313-3250 FAX NO. (Optional): (310) 572-7581</p> <p>E-MAIL ADDRESS (Optional): TONY@PEYMANRAHNAMA.COM</p> <p>ATTORNEY FOR (Name): PLAINTIFFS</p>	<p>FOR COURT USE ONLY</p> <p>OCT 13 2020</p>
<p>SUPERIOR COURT OF CALIFORNIA, COUNTY OF SUPRIOR COURT</p> <p>STREET ADDRESS: 800 S VICTORIA AVE.,</p> <p>MAILING ADDRESS: 800 S VICTORIA AVE.,</p> <p>CITY AND ZIP CODE: VENTURA, CA 93009</p> <p>BRANCH NAME: Hall of Justice</p>	
<p>PLAINTIFF: ALYSSA GUZMAN, an individual</p> <p>DEFENDANT IRMA MENDEZ, an individual; COIN LAUNDRY ; LAUNDROMAT, a business form unknown</p> <p><input checked="" type="checkbox"/> DOES 1 TO 25 INCLUSIVE</p>	
<p>COMPLAINT—Personal Injury, Property Damage, Wrongful Death</p> <p><input type="checkbox"/> AMENDED (Number):</p> <p>Type (check all that apply):</p> <p>MOTOR VEHICLE <input type="checkbox"/> OTHER (specify): PREMISES LIABILITY</p> <p><input type="checkbox"/> Property Damage <input type="checkbox"/> Wrongful Death</p> <p><input checked="" type="checkbox"/> Personal Injury <input checked="" type="checkbox"/> Other Damages (specify): All available</p>	
<p>Jurisdiction (check all that apply):</p> <p><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</p> <p><input checked="" type="checkbox"/> ACTION IS AN UNLIMITED CIVIL CASE (exceeds \$25,000)</p> <p><input type="checkbox"/> ACTION IS RECLASSIFIED by this amended complaint</p> <p><input type="checkbox"/> from limited to unlimited <input type="checkbox"/> from unlimited to limited</p>	
<p>CASE NUMBER:</p>	

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1. Plaintiff (name or names): **ALYSSA GUZMAN, an individual**
alleges causes of action against defendant (name or names):
Defendants and each of them.
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): **COIN LAUNDRY LAUNDROMAT**
 - (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): **a business form unknown**
 - 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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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 15 TO 20**
- (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): 1 - 25 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 - 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):

ALL RELATED DAMAGES ALLOWED BY LAW.

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: **10-09-2020**

PEJMAN RAHNAMA, ESQ.

 (TYPE OR PRINT NAME)



 (SIGNATURE OF PLAINTIFF OR ATTORNEY)

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FIRST _____ CAUSE OF ACTION—Premises Liability Page 4
 (number)

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

Prem.L-1. Plaintiff (name): **Alyssa Guzman, an individual**
 alleges the acts of defendants were the legal (proximate) cause of damages to plaintiff.
 On (date): **10/16/2018** plaintiff was injured on the following premises in the following
 fashion (description of premises and circumstances of injury):
See Attachment A.

Prem.L-2. **Count One—Negligence** The defendants who negligently owned, maintained, managed and
 operated the described premises were (names):
Defendant and each of them.

Does _____ to _____

Prem.L-3. **Count Two—Willful Failure to Warn** [Civil Code section 846] The defendant owners who willfully
 or maliciously failed to guard or warn against a dangerous condition, use, structure, or activity were
 (names):
Defendant and each of them.

Does _____ to _____

Plaintiff, a recreational user, was an invited guest a paying guest.

Prem.L-4. **Count Three—Dangerous Condition of Public Property** The defendants who owned public property
 on which a dangerous condition existed were (names):

Does _____ to _____

- a. The defendant public entity had actual constructive notice of the existence of the
 dangerous condition in sufficient time prior to the injury to have corrected it.
- b. The condition was created by employees of the defendant public entity.

Prem.L-5. a. **Allegations about Other Defendants** The defendants who were the agents and employees of the
 other defendants and acted within the scope of the agency were (names):
Defendant and each of them.

Does _____ to _____

- b. The defendants who are liable to plaintiffs for other reasons and the reasons for their liability are
 described in attachment Prem.L-5.b as follows (names):

Attachment A - First Cause of Action - Premises Liability

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Prem. L-1 Continued - Description of premises and circumstances of injury:

On said date, at 301 E. Port Hueneme Road, Port Hueneme, CA 93041 ("the premises"), Defendants and each of them, who are occupiers, owners, operators and controllers of said premises, negligently, carelessly and recklessly caused and allowed said premises to be afflicted with foreseeably dangerous and hazardous conditions which were or should in the exercise of reasonable diligence have been known to them, failed and refused to either warn of said conditions or to remedy same. As a direct and proximate result of said negligence, carelessness and recklessness, Plaintiff was caused to slip and fall and thereby directly and proximately sustain serious and substantial personal injuries with related, consequential disabilities and general and special damages.

SHORT TITLE:

GUZMAN VS. MENDEZ

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SECOND

(number)

CAUSE OF ACTION—General NegligencePage 5ATTACHMENT TO Complaint Cross - Complaint*(Use a separate cause of action form for each cause of action.)*GN-1. Plaintiff (name): **Alyssa Guzman, an individual**alleges that defendant (name): **Defendants and each of them** 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): **10-16-2018**at (place): **301 E. Port Hueneme Road, Port Hueneme, CA 93041***(description of reasons for liability):***Plaintiff refers to her First Cause of Action, hereof and by this reference makes it a part of her Second Cause of Action, as though set forth at length herein.****Further, at said time and place Defendants and each of them so negligently and carelessly operated, owned, entrusted, maintained, repaired and managed their automobile such that it collided with plaintiff. As a direct and proximate result of said unlawful conduct, Defendants and each of them directly and proximately caused Plaintiff to sustain serious and substantial personal injuries and property damages, as well as all other general and special damages to which plaintiff is entitled by law.**