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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

10 JANE DOE) **CASE NO.**
11)
12 Plaintiff,) **COMPLAINT FOR DAMAGES**
13 vs.) **NEGLIGENCE**
14 JOHN DOE; AND DOES 1-50, inclusive)
15 Defendants.)
16 _____)

17
18 COMES NOW Plaintiff JANE DOE, and for causes of action against Defendant, JOHN
19 DOE and DOES 1 THROUGH 50, inclusive, alleges:

20 **GENERAL ALLEGATIONS**

21 1. The true names and/or capacities, whether individual, corporate, associate or
22 otherwise, of defendants DOES 1 through 50, inclusive, and each of them, are unknown to Plaintiff,
23 who therefore sues said defendants by such fictitious names. Plaintiff is informed and believes and
24 thereupon alleges that each of the Defendants fictitiously named herein as a DOE is legally
25 responsible, negligently or in some other actionable manner, for the events and happenings
26 hereinafter referred to, and thereby proximately caused the injuries and damages to Plaintiff as
27 hereinafter alleged. Plaintiff will seek leave of court to amend this Complaint and state the true
28

1 names and/or capacities of said fictitiously named Defendants when the same have been
2 ascertained.

3 2. Plaintiff is informed and believes and thereupon alleges that at all times mentioned
4 herein, Defendants, and each of them, including DOES 1 through 50, inclusive, and each of them,
5 were the agents, servants, employees and/or joint venturers of their co-defendants, and each was, as
6 such, acting within the course, scope and authority of said agency, employment and/or venture, and
7 that each and every defendant, as aforesaid, when acting as a principal, was negligent in the
8 selection and hiring of each and every other defendant as an agent, employee and/or joint venturer.
9

10 3. Plaintiff JANE DOE is a resident of the County of Los Angeles, State of
11 California. As a result of the incident herein sued upon, Plaintiff sustained severe and permanent
12 injuries.
13

14 4. Plaintiff is informed and believes, and thereupon alleges, that Defendant JOHN
15 DOE is a resident of California, County of Los Angeles and resides at XXX Street, Los Angeles,
16 California.
17

18 5. At all times mentioned herein, Defendant JOHN DOE and DOES 1 through 50,
19 inclusive, and each of them, were the owners of or had an ownership interest in that certain
20 automobile with California 1234567, hereinafter referred to as "XXXXX."

21 6. On or about January 1, 2011, Plaintiff JANE DOE was operating a motor vehicle
22 at or near the intersection of X St. and Y Ave. in the city of Los Angeles, CA.

23 7. That on or about January 1, 2011, while JANE DOE was operating her vehicle,
24 Defendant JOHN DOE caused the vehicle to collide with JANE DOE'S vehicle, causing her serious
25 and permanent injuries.
26

27 **FIRST CAUSE OF ACTION**

28 **(Negligence)**

1 8. Plaintiff realleges and incorporates herein by reference paragraphs 1 through 7,
2 inclusive, of the General Allegations, above.

3 9. Plaintiff is informed and believes and thereupon alleges that at all times mentioned
4 herein, Defendant had a duty to drive in a safe and prudent manner so that vehicle would not collide
5 with Plaintiff's vehicle.
6

7 10. Plaintiff is informed and believes and thereupon alleges that at all times
8 mentioned here, Defendant and DOES 1 through 50 breached said duty by negligently and
9 carelessly driving, operating, controlling, entrusting, handling, possessing, managing and
10 maintaining the vehicle so that same was caused to and did collide with Plaintiff's vehicle,
11 proximately causing the injuries and damages to Plaintiff as hereinafter alleged.
12

13 11. As a direct and proximate result of the conduct of the defendants, and each of
14 them, as aforesaid, plaintiff was injured and hurt in her health, strength and activity, sustaining
15 injuries to her body, and shock and injury to her nervous system and person, all of which said injuries
16 have caused and continue to cause the plaintiff great physical, mental and nervous pain and suffering.
17 Plaintiff is informed and believes and thereupon alleges that said injuries will result in some
18 permanent disability, all to her general damage in an amount which will be stated according to proof.
19

20 12. As a direct and proximate result of the conduct of the defendants, and each of
21 them, as aforesaid, the plaintiff was compelled to and did employ the services of hospitals,
22 physicians, surgeons, nurses and the like, to care for and treat her, and did incur hospital, medical,
23 professional and incidental expenses, and plaintiff is informed and believes and thereupon alleges
24 that by reason of her injuries, plaintiff will necessarily incur additional like expenses for an
25 indefinite period of time in the future, the exact amount of which expenses will be stated according
26 to proof.
27

28 13. As a direct and proximate result of the conduct of the defendant, and each of them,

1 as aforesaid, plaintiff was prevented from attending to her usual occupation, and plaintiff is
2 informed and believes and thereupon alleges that she will thereby be prevented from attending to
3 her usual occupation for a period of time in the future, and thereby will also sustain a loss of earning
4 capacity, in addition to lost earnings, past, present and future; the exact amount of such losses is
5 unknown to plaintiff at this time, and when said amounts are ascertained, the plaintiff will ask leave
6 of court to amend this Complaint and allege said amounts according to proof.
7

8 WHEREFORE, Plaintiff prays judgment against Defendants, and each of them, as
9 follows:

- 10 1. For general damages;
- 11 2. For medical, hospital and related expenses;
- 12 3. For emotional distress;
- 13 4. For cost of suit incurred herein;
- 14 5. For such other and further relief as the Court may deem just and proper;
- 15 6. For loss of earnings and loss of earning capacity; and
- 16 7. For prejudgment interest, according to proof.

17
18 DATED: FISHER & TALWAR
19 Professional Law Corporation

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21 BY: _____
22 VIBHU TALWAR
23 Attorneys for Plaintiff
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