



SHORT TITLE: Olmedo v. Englund	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*):
- (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*): 1 through 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 through 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: Olmedo v. Englund	CASE NUMBER:
-----------------------------------	--------------

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):

such other relief the court finds reasonable

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):

All paragraphs

Date: December 3, 2012

Devin N. Robinson

(TYPE OR PRINT NAME)



(SIGNATURE OF PLAINTIFF OR ATTORNEY)

SHORT TITLE: Olmedo v. Englund	CASE NUMBER:
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First \_\_\_\_\_ **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): Eric Olmedo

alleges that defendant (name): John Englund

Does 1 \_\_\_\_\_ to 50 \_\_\_\_\_

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): or about 12-07-2010

at (place): Highway 405 Northbound in or near Long Beach, CA county of Los Angeles

(description of reasons for liability):

Plaintiff realleges and incorporates herein by reference each and every allegation in Plaintiff's complaint as therein alleged, as fully completely as if repeated verbatim herein. Plaintiff alleges that Defendants negligently owned, operated, serviced and/or maintained their vehicle in such a manner and at such a time where the Defendants knew or through their exercise of reasonable care should have known that said negligent conduct would have likely caused injury to Plaintiff.

Plaintiff Eric Olmedo was stopped in traffic as a seat-belted driver of his automobile on Highway 405 Northbound, in or about Long Beach, CA in Los Angeles County. At this time and place, Defendant John Englund was operating a motor vehicle driving behind Plaintiff. Defendant John Englund ran his vehicle into the back of Plaintiff's, pushing Plaintiff forward into another vehicle. Plaintiff failed to keep a proper lookout and/or failed to maintain control of the vehicle and/or failed to timely stop for stopped traffic and/or failed to take evasive action to avoid a collision. The force of the impact pushed Plaintiff's vehicle into the vehicle in front of him.

As a direct and proximate result of Defendants' actions, Plaintiff sustained personal injuries and attendant damage.

SHORT TITLE: Olmedo v. Englund	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): Eric Olmedo

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): December 7, 2010

at (place):

or near Northbound Highway 405 in or near Long Beach, California, Los Angeles County. Plaintiff incorporates by reference as if fully set forth in this cause of action each and every allegation contained in Plaintiff's First Cause of Action.

MV- 2. DEFENDANTS

a.  The defendants who operated a motor vehicle are (names):  
 John Englund

Does 1 \_\_\_\_\_ to 10 \_\_\_\_\_

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

Does 1 \_\_\_\_\_ to 20 \_\_\_\_\_

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

Does 1 \_\_\_\_\_ to 30 \_\_\_\_\_

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

Does 1 \_\_\_\_\_ to 40 \_\_\_\_\_

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

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:  
 John Englund

Does 1 \_\_\_\_\_ to 50 \_\_\_\_\_

Page 5