





JOHN C. TORJESEN & ASSOCIATES, PC

812 N. SEPULVEDA BLVD., 3<sup>RD</sup> FLOOR  
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1 custodians, developers or other persons in control of certain premises located in  
2 the County of Los Angeles, State of California, that they were operating as a  
3 personal residence, and were responsible for the design, construction,  
4 maintenance, upkeep, repair, inspection, development, use, service, contracting,  
5 renting, leasing, *etc.*, of those premises, including but not limited to drop off,  
6 landscaping, plantings, and other items on or part of the design and layout of that  
7 property in Los Angeles County, State of California, the address of that particular  
8 property of defendant Sharon Stone is unknown but all management and other  
9 services pertaining thereto are done through offices located 9200 Sunset Blvd.,  
10 Suite 600, Los Angeles, California 90069..

11  
12 6. At all times herein material, defendants Sharon Stone, an individual,  
13 and Does 1 through 100, Inclusive, and her agents and employees, were  
14 servicing, maintaining and otherwise operating the grounds at the aforesaid  
15 premises located in the County of Los Angeles, State of California.

16  
17 7. On or about August 25, 2006, while present at that property of  
18 defendant Sharon Stone as an invitee, plaintiff Peter Krause was caused to fall  
19 past plantings on a trellis or other structure, and fall down a large, concealed  
20 drop-off, sustaining thereby severe and permanent injuries more fully hereinafter  
21 described.

22  
23 8. As a direct and legal result of the foregoing acts and omissions of the  
24 defendants, and each of them, plaintiff was rendered sick, sore, lame, disabled  
25 and disordered, both internally and externally, and suffered, among other things,  
26 numerous internal injuries, severe fright, shock, pain, discomfort, and anxiety.  
27 The exact nature and extent of said injuries are not known to plaintiff who will  
28 seek leave of Court to amend and insert same when they are ascertained.





1 17. As a direct and legal result of the foregoing acts and omissions of the  
2 defendants, and each of them, plaintiff was rendered sick, sore, lame, disabled  
3 and disordered, both internally and externally, and suffered, among other things,  
4 numerous internal injuries, severe fright, shock, pain, discomfort, and anxiety.  
5 The exact nature and extent of said injuries are not known to plaintiff who will  
6 seek leave of Court to amend and insert same when they are ascertained.  
7 Plaintiff does not at this time know the exact duration or permanence of said  
8 injuries, but is informed and believes, and thereon alleges, that some of said  
9 injuries are reasonably certain to be permanent in character.

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11 18. As a further result of the foregoing acts and omissions of the  
12 defendants, and each of them, plaintiff has been forced to incur expenses for  
13 medical and surgical care, x-rays, hospital and laboratory costs during the period  
14 of plaintiff's disability and is informed and believes, and thereon alleges, that  
15 plaintiff will in the future be forced to incur additional expenses of the same  
16 nature, all in an amount which is at present unknown. Plaintiff will pray leave of  
17 Court to show the exact amount of said expenses at the time of trial.

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19 19. Prior to the occurrence of the incidents, plaintiff was an able-bodied  
20 individual, but since said incidents plaintiff has been unable to engage fully in  
21 plaintiff's occupation, and is informed and believes, and thereon alleges, that  
22 plaintiff will be incapacitated and unable to perform plaintiff's usual work for an  
23 indefinite period of time in the future, all to plaintiff's damage in an amount which  
24 is at present unascertained. Plaintiff will pray leave of Court to show the total  
25 amount of loss of earnings and impaired earning capacity at the time of trial.

26

27 20. Plaintiff was generally damaged in an amount within the jurisdictional  
28 limits of the Superior Court of the State of California.

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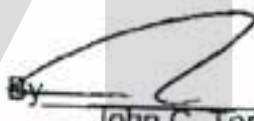
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WHEREFORE, plaintiff Peter Krause prays judgment be entered against defendants and each of them as follows:

1. For general damages in an amount within the jurisdictional limits of this court;
2. For lost income and impaired earning capacity, according to proof;
3. For medical expenses and related items of expense, according to proof;
4. For pain, suffering, discomfort, emotional distress and related expenses or losses, according to proof;
6. For costs of suit incurred herein;
7. For such other and further relief as the Court may deem just and proper;
8. For prejudgment interest according to proof;

DATED: August 7, 2008

JOHN C. TORJESEN  
& ASSOCIATES, PC

By   
John C. Torjesen  
Attorneys for Plaintiff  
PETER KRAUSE