

1 F. JAVIER TRUJILLO, Esq. SBN: 123639
LAW OFFICES OF F. JAVIER TRUJILLO
2 3255 Wilshire Blvd. Suite 830
Los Angeles, CA 90010
3 213-382-2600 Voice
213-381-8354 Fax

4
5 Attorney for Plaintiff, DONALD LITE

FILED
LOS ANGELES SUPERIOR COURT

DEC 08 2008

JOHN A. CLARKE, CLERK
J. White Right
BY M. WHITRIGHT, DEPUTY

6
7
8 SUPERIOR COURT OF THE STATE OF CALIFORNIA

9 FOR THE COUNTY OF LOS ANGELES

10
11 DONALD LITE,
12 Plaintiff,
13 vs.
14 BRANDY NORWOOD, AWATEF
15 ABOUDIHAJ and DOES 1-20,
16 Defendant

Case No.: **LC083683**
COMPLAINT FOR PERSONAL INJURY
1. NEGLIGENCE
2. VIOLATION OF STATUTE

17 **FIRST COUNT - NEGLIGENCE**
18 **AGAINST BRANDY NORWOOD, AWATEF ABOUDIHAJ and DOES**
19 **1-20, Inclusive**

20 COMES NOW THE plaintiff, DONALD LITE, and for a First
21 Count against the defendants, and each of them, inclusive,
22 complains and alleges as follows:

23 1. That the true names and capacities, whether
24 individual or corporate, associate or otherwise of
25 defendants, DOES 1-20, and each of them, inclusive, are
unknown to the plaintiff at this time, who therefore sues

1 said defendants by such fictitious names. The plaintiff
2 will amend this complaint to allege the true names and
3 capacities of each DOE defendant when said name and
4 capacity has been ascertained. The plaintiff is informed
5 and believes, and thereon alleges, that each of the
6 fictitiously named defendants is responsible, in some
7 manner, for the events and happenings herein alleged, and
8 that the plaintiff's damages, as herein alleged, were
9 proximately caused by the acts and omissions of these
10 fictitiously named defendants.

11 2. At all times herein mentioned the defendants, and
12 each of them, inclusive, were the employees, agents and/or
13 servants of the remaining co-defendants and in doing the
14 things herein alleged were at all times herein acting with
15 the course and scope of such employment, agency or service
16 and with the actual or constructive knowledge of the
17 remaining co-defendants.

18 3. That on and before December 30, 2006, the defendant,
19 BRANDY NORWOOD and DOES 1-5 and each of them, inclusive,
20 owned, controlled, leased, rented or otherwise exercised
21 care, dominion and control over a certain 2007 Landrover
22 Rangerover vehicle and gave actual or implied consent to
23 the remaining co-defendants, DOES 6-10 to operate said
24 vehicle at and before the events complained of herein.

1 4. That on and before December 30, 2006, the defendant,
2 AWATEF ABOUDIHAJ and DOES 11-15 and each of them,
3 inclusive, owned, controlled, leased, rented or otherwise
4 exercised care, dominion and control over a certain 2005
5 Toyota Corolla vehicle with California registration number
6 and gave actual or implied consent to the remaining
7 co-defendants, DOES 16-20 to operate said vehicle at and
8 before the events complained of herein.

9 5. That on December 30, 2006, plaintiff was traveling
10 northbound on I-405 Highway 600 feet South of Sepulveda
11 Boulevard, in the City of Los Angeles and State of
12 California, defendants, BRANDY NORWOOD, and DOES 1-10, each
13 of them inclusive, while driving northbound on I-405
14 Highway)drove said 2007 Landrover Rangerover at an
15 excessive speed for conditions, failed to keep a proper
16 lookout and failed to maintain a safe distance so as to
17 permit the vehicle driven by BRANDY NORWOOD to fail to stop
18 behind the vehicle of AWATEF ABOUDIHAJ. This initial
19 collision resulted in the vehicle of AWATEF ABOUDIHAJ being
20 pushed forward and colliding with the rear of the
21 plaintiff's vehicle.

22 6. That on December 30, 2006, plaintiff was traveling
23 northbound on I-405 Highway 600 feet South of Sepulveda
24 Boulevard, in the City of Los Angeles and State of
25 California, defendants, AWATEF ABOUDIHAJ, and DOES 11-20,

1 each of them inclusive, while driving northbound on I-405
2 Highway)drove said 2005 Toyota Corolla vehicle at an
3 excessive speed for conditions, failed to keep a proper
4 lookout and failed to maintain a safe distance so as to
5 permit the vehicle driven by AWATEF ABOUDIHAJ to fail to
6 stop behind the plaintiff's vehicle.

7 7. As a direct and proximate result of the negligence,
8 carelessness and recklessness of the defendants, and each
9 of them, inclusive, the plaintiff has been hurt and injured
10 in his body and person. Plaintiff suffered serious and
11 permanent injuries all of which have caused, and continue
12 to cause pain, suffering and nervousness which were a
13 direct and proximate result of the negligence of the
14 defendants, and each of them, inclusive. The plaintiff
15 required medical consultation, care and treatment from
16 physicians and has undergone x-rays, examinations and other
17 diagnostic tests and treatments, and the plaintiff will,
18 in the future, require medical consultations and the care
19 and treatment of physicians, surgeons as well as additional
20 x-rays, examinations and other diagnostic tests and
21 treatments to cure and correct the effects of injuries
22 suffered by plaintiff all in an amount which is presently
23 unknown to the plaintiff herein but, the plaintiff
24 believes, and thereon alleges, that said damages and
25 injuries are in an amount which exceeds the minimal

1 jurisdictional limit of the court of unlimited
2 jurisdiction. The plaintiff will ask leave of the court to
3 amend this complaint once said amounts have been
4 ascertained.

5 **SECOND COUNT - VIOLATION OF STATUTE**
6 **AGAINST BRANDY NORWOOD, AWATEF ABOUDIHAJ and DOES**
7 **1-20, Inclusive**

8 COMES Now the plaintiff and for a Second Cause of
9 Action against the defendants BRANDY NORWOOD, AWATEF
10 ABOUDIHAJ and DOES 1-20, and each of them inclusive and
11 complains and alleges as follows:

12 8. Plaintiff repeats and re-alleges each and every
13 paragraph contained in the First Count and incorporates
14 each paragraph by reference as though fully and completely
15 set forth below verbatim.

16 9. At all pertinent times mentioned herein the
17 following rules, regulations and codes where in effect:

18 10. Vehicle Code § 22350. No person shall drive a
19 vehicle upon a highway at a speed greater than is
20 reasonable or prudent having due regard for weather,
21 visibility, the traffic on, and the surface and width
22 of, the highway, and in no event at a speed which
23 endangers the safety of persons or property.

24 11. Vehicle Code § 21703. The driver of a motor
25 vehicle shall not follow another vehicle more closely
than is reasonable and prudent, having due regard for

1 the speed of such vehicle and the traffic upon, and the
2 condition of, the roadway. [Added 1959 ch. 3.]

3 12. Defendants violated these and other not yet known
4 and ascertained rules, regulations and enactment. These
5 violations directly and proximately cause or contributed to
6 the damages, injuries and losses suffered by and those that
7 will in the future be suffered by the plaintiff.

8 13. As a direct and proximate result of the
9 negligence, carelessness and recklessness and of the
10 defendants, and each of them, inclusive, the plaintiff has
11 been hurt and injured in his body and person. Plaintiff
12 suffered serious and permanent injuries all of which has
13 caused, and continues to cause pain, suffering and
14 nervousness which were a direct and proximate cause of the
15 negligence of the defendants and each of them, inclusive.
16 The plaintiff required medical consultation, care and
17 treatment from physicians and surgeons and has undergone x-
18 rays, examinations and other diagnostic tests and
19 treatments, and the plaintiff will, in the future,
20 require medical consultations as well as the care and
21 treatment of physicians, surgeons and additional x-rays,
22 examinations and other diagnostic tests and treatments to
23 cure and correct the effects of injuries suffered by
24 plaintiff all in an amount which is presently unknown to
25 the plaintiff herein but the plaintiff believes and thereon

1 alleges that said damages and injuries are in an amount
2 which exceeds the minimal jurisdictional limit of the
3 court of unlimited jurisdiction. The plaintiff will ask
4 leave of the court to amend this complaint once said
5 amounts have been ascertained.

6 WHEREFORE as to the FIRST COUNT and the SECOND COUNTS
7 plaintiff prays judgment against the defendants, and each
8 of them, inclusive as follows:

9 1. For general damages in excess of the minimal
10 jurisdictional limits of the court of unlimited
11 jurisdiction;

12 2. For the cost of medical care according to proof;

13 3. For the costs of repair to Plaintiff's vehicle
14 according to proof;

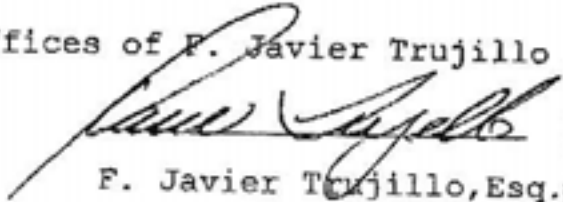
15 4. For loss of wages and wage-earning capacity
16 according to proof;

17 5. For prejudgment interests;

18 6. For the costs of suit incurred herein; and,

19 7. For such other and further relief as may seem fair
20 and just

21 DATED: December 4, 2008 Law Offices of F. Javier Trujillo



F. Javier Trujillo, Esq.
Attorney for Plaintiff

SLIP(S)
(CITACION JUDICIAL)

SUM-100

NOTICE TO DEFENDANT:
(AVISO AL DEMANDADO):
BRANDX NORWOOD, AWATEF ABOUDIHAIJ AND DOES 1-20

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)

FILED
LOS ANGELES SUPERIOR COURT

DEC 08 2008

JOHN A. CLARKE, CLERK
J. A. Clarke
BY N. WHITRIGHT, DEPUTY

YOU ARE BEING SUED BY PLAINTIFF:
(LO ESTÁ DEMANDANDO EL DEMANDANTE):
DONALD LITE

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.courtinfo.ca.gov/selfhelp/espanol), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia. Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.courtinfo.ca.gov/selfhelp/espanol) o poniéndose en contacto con la corte o el colegio de abogados locales.

CASE NUMBER:
(Número del Caso): **083683**

The name and address of the court is:
(El nombre y dirección de la corte es):
LASC-Van Nuys Courthouse East
6230 Sylmar Ave.
SAME
Van Nuys, CA 91401
Northwest District

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):
F. JAVIER TRUJILLO SBN: 123639
LAW OFFICES OF F. JAVIER TRUJILLO
3255 Wilshire Blvd. Suite 830,
LOS ANGELES, CA 90010
DATE: 12/4/08

DEC 08 2008 JOHN A. CLARKE

Clerk, by _____
(Secretario) *N. Whitright*, Deputy (Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)
(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010).)



- NOTICE TO THE PERSON SERVED: You are served
- as an individual defendant.
 - as the person sued under the fictitious name of (specify):
 - on behalf of (specify):
under: CCP 416.10 (corporation) CCP 416.60 (minor)
 CCP 416.20 (defunct corporation) CCP 416.70 (conservatee)
 CCP 416.40 (association or partnership) CCP 416.90 (authorized person)
 other (specify):
 - by personal delivery on (date):

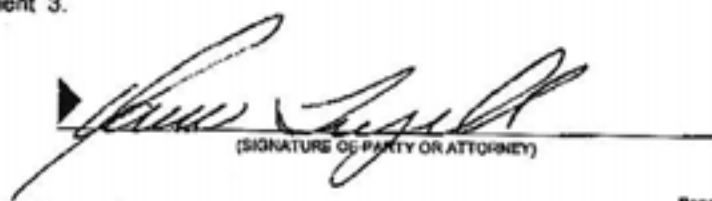
<p>ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): F. JAVIER TRUJILLO SBN: 123639 LAW OFFICES OF F. JAVIER TRUJILLO LAW OFFICES OF F. JAVIER TRUJILLO 3255 WILSHIRE BLVD. SUITE 830 LOS ANGELES, CA 90010 TELEPHONE NO.: (213) 382-2600 FAX NO. (Optional): E-MAIL ADDRESS (Optional):</p>	<p>FOR COURT USE ONLY</p> <p>FILED LOS ANGELES SUPERIOR COURT</p> <p>DEC 08 2008</p> <p>JOHN A. CLARKE, CLERK <i>J. A. Clarke</i> BY N. WHITRIGHT, DEPUTY</p> <p>CASE NUMBER: LC083683</p> <p>JUDICIAL OFFICER:</p> <p>DEPT.:</p>
<p>ATTORNEY FOR (Name): PLAINTIFF- DONALD LITE</p> <p>SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 6230 Sylmar Ave. MAILING ADDRESS: SAME CITY AND ZIP CODE: Van Nuys, CA 91401 BRANCH NAME: Northwest District</p>	
<p>PLAINTIFF/PETITIONER: DONALD LITE</p> <p>DEFENDANT/RESPONDENT: BRANDY NORWOOD, AWATEF ABOUDIHAIJ AND DOES 1-20.</p> <p>NOTICE OF RELATED CASE</p>	

The following case or cases are related to the above-captioned case:

1. a. Title: **ABOUDIHAIJ AHMED; ET AL. VS BRANDY NORWOOD; ET AL.**
 b. Court: same as above other (name and address):
 c. Case number: **LC076941**
 d. Filing date: **1/30/07**
 e. Relationship to this case: **Plaintiff LITE's injuries result from the same incident/event, a car accident on 12/30/06.**
 f. If the related case is pending in the same court as this case, explain why the assignment of the cases to a single judge is likely to result in efficiencies: **Reduce trial time and improve judicial efficiency, as well as avoid verdicts that might conflict.**
 Additional explanation is attached in Attachment 1.
2. a. Title:
 b. Court: same as above other (name and address):
 c. Case number:
 d. Filing date:
 e. Relationship to this case:
 f. If the related case is pending in the same court as this case, explain why the assignment of the cases to a single judge is likely to result in efficiencies:
 Additional explanation is attached in Attachment 2.
3. Additional related cases are described in Attachment 3.

Date: 12/4/08

F. JAVIER TRUJILLO, ESO
 (TYPE OR PRINT NAME OF PARTY OR ATTORNEY)


 (SIGNATURE OF PARTY OR ATTORNEY)