

<p>ATTORNEY OR PARTY WITHOUT ATTORNEY STATE BAR NUMBER:</p> <p>NAME: Thanos Simoudis, Esq (SBN 314930); Dario C. Gomez, Esq. (SBN 322521)</p> <p>FIRM NAME: Culver Legal, LLP</p> <p>STREET ADDRESS: 5670 Wilshire Blvd., Suite 1370</p> <p>CITY: Los Angeles STATE: CA ZIP CODE: 90036</p> <p>TELEPHONE NO.: (310) 600-7881 FAX NO.:</p> <p>EMAIL ADDRESS: litigation@culverlegal.com; dario@culverlegal.com</p> <p>ATTORNEY FOR (name): Plaintiff Andrew Lance Wyant</p>	<p>FOR COURT USE ONLY</p> <p>Electronically FILED by Superior Court of California, County of Los Angeles 3/01/2024 3:18 PM David W. Slayton, Executive Officer/Clerk of Court, By Y. Tarasyuk, Deputy Clerk</p>
<p>SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES</p> <p>STREET ADDRESS: 111 North Hill Street</p> <p>MAILING ADDRESS: Same as above</p> <p>CITY AND ZIP CODE: Los Angeles, CA 90012</p> <p>BRANCH NAME: Stanley Mosk Courthouse</p>	
<p>PLAINTIFF: Andrew Lance Wyant</p> <p>DEFENDANT: Andres Mejia; Jose Decastro; and</p> <p><input checked="" type="checkbox"/> DOES 1 TO 100 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><input checked="" type="checkbox"/> MOTOR VEHICLE <input type="checkbox"/> OTHER (specify):</p> <p><input checked="" type="checkbox"/> Property Damage <input type="checkbox"/> Wrongful Death</p> <p><input checked="" type="checkbox"/> Personal Injury <input type="checkbox"/> Other Damages (specify):</p>	<p>CASE NUMBER:</p> <p style="font-size: 24px; text-align: center; margin-top: 20px;">24STCV05240</p>
<p>Jurisdiction (check all that apply):</p> <p><input type="checkbox"/> ACTION IS A LIMITED CIVIL CASE (does not exceed \$35,000)</p> <p style="padding-left: 20px;">Amount demanded <input type="checkbox"/> does not exceed \$10,000</p> <p style="padding-left: 20px;"><input type="checkbox"/> exceeds \$10,000</p> <p><input checked="" type="checkbox"/> ACTION IS AN UNLIMITED CIVIL CASE (exceeds \$35,000)</p> <p><input type="checkbox"/> ACTION IS RECLASSIFIED by this amended complaint</p> <p style="padding-left: 20px;"><input type="checkbox"/> from limited to unlimited</p> <p style="padding-left: 20px;"><input type="checkbox"/> from unlimited to limited</p>	

1. Plaintiff (name or names): Andrew Lance Wyant
alleges causes of action against defendant (name or names):
Andres Mejia; Jose Decastro; and Does 1 to 100, inclusive
 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):
 - (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):
 - 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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Wyant v. Mejja, et al.

CASE NUMBER:

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 to 50

named defendants and acted within the scope of that agency or employment.

were the agents or employees of other

b. Doe defendants (*specify Doe numbers*): 51 to 100

plaintiff.

are persons whose capacities are unknown to

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, anda. has complied with applicable claims statutes, orb. 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 (*check all that apply*)

- 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*):
 Future loss of earnings; future medical bills; future pain and suffering.

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.
- b. 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*):
 MV-1;MV-2;GN-1

Date: 02/27/2024

Dario C. Gomez, Esq.

 (TYPE OR PRINT NAME)



 (SIGNATURE OF PLAINTIFF OR ATTORNEY)

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First _____ **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): Andrew Lance Wyant

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): 03/19/2022

at (place):

or about Wilton Pl and Santa Monica Blvd, Los Angeles, CA 90038.

MV- 2. DEFENDANTS

a. The defendants who operated a motor vehicle are (names):
 Andres Mejia; Jose Decastro; and

Does 1 _____ to 100 _____

b. The defendants who employed the persons who operated a motor vehicle in the course of their employment are (names):
 Andres Mejia; Jose Decastro; and

Does 1 _____ to 100 _____

c. The defendants who owned the motor vehicle which was operated with their permission are (names):
 Andres Mejia; Jose Decastro; and

Does 1 _____ to 100 _____

d. The defendants who entrusted the motor vehicle are (names):
 Andres Mejia; Jose Decastro; and

Does 1 _____ to 100 _____

e. The defendants who were the agents and employees of the other defendants and acted within the scope of the agency were (names):
 Andres Mejia; Jose Decastro; and

Does 1 _____ to 100 _____

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:

Andres Mejia; Jose Decastro; and DOES 1 to 100, Inclusive are liable to Plaintiff, the reasons therefore and the nature and extent of which has not yet been ascertained.

Does 1 _____ to 100 _____

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Second _____
(number)

CAUSE OF ACTION—General Negligence

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ATTACHMENT TO Complaint Cross-Complaint

(Use a separate cause of action form for each cause of action.)

GN-1. Plaintiff *(name)*: Andrew Lance Wyant

alleges that defendant *(name)*: Andres Mejia; Jose Decastro; and

Does 1 to 100

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)*: 03/19/2022

at *(place)*: or about Wilton Pl and Santa Monica Blvd, Los Angeles, CA 90038.

(description of reasons for liability):

The Defendants operated their vehicle negligently so as to collide with Plaintiff and cause injuries to Plaintiff.