ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):	FOR COURT USE ONLY
John H. Gomez (SBN: 171485); Corey C. Garrard (SBN: 308003)	7 511 555111 552 51121
Gomez Trial Attorneys	ELECTRONICALLY FILED
655 W. Broadway, Suite 1700	Superior Court of California,
San Diego, CA 92101	County of San Diego
TELEPHONE NO: (619) 237-3490 FAX NO. (Optional): (619) 237-3496	09/08/2021 at 03:13:38 PM
E-MAIL ADDRESS (Optional):	Clerk of the Superior Court
ATTORNEY FOR (Name): Deanna Beck	By Kristin Sorianosos Deputy Clerk
SUPERIOR COURT OF CALIFORNIA, COUNTY OF San Diego	
STREET ADDRESS: 330 West Broadway	
mailing address: 330 West Broadway	
CITY AND ZIP CODE: San Diego, CA 92101	
BRANCH NAME: Hall of Justice	
PLAINTIFF: Deanna Beck	
DEFENDANT: USA Waste of California, Inc., a Delaware Corporation; and	
□ DOES 1 TO 50	
COMPLAINT—Personal Injury, Property Damage, Wrongful Death	
☐ AMENDED (Number):	
Type (check all that apply):	
☐ Property Damage ☐ Wrongful Death	
Personal Injury Other Damages (specify):	
Jurisdiction (check all that apply):	CASE NUMBER:
Action is a limited civil case	07 0004 0000000 OU RA OTI
Amount demanded does not exceed \$10,000 exceeds \$10,000, but does not exceed \$25,000	37-2021-00038390-CU-PA-CTL
ACTION IS AN UNLIMITED CIVIL CASE (exceeds \$25,000)	
ACTION IS RECLASSIFIED by this amended complaint	
from limited to unlimited	
from unlimited to limited	
Plaintiff (name or names): Deanna Beck, an individual	
alleges causes of action against <b>defendant</b> (name or names): USA Waste of Californi	a Inc. a Delaware Corporation and
DOES 1 to 50	a, mo., a Bolawaro Corporation, and
2. This pleading, including attachments and exhibits, consists of the following number of pa	ges: 5
3. Each plaintiff named above is a competent adult	9 0
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) a for whom a guardian or conservator of the estate or a guardian	dian 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 min <u>or</u> 🔲 an adult	
(a)	dian ad litem has been appointed
(b) other (specify):	
(5) other (specify):	
☐ Information about additional plaintiffs who are not competent adults is shown in Atta	achment 3.

	SHORT TI Beck v. l		e of California, Inc., et al.						CASE NUMBER:	
4.		aintiff <i>(name</i>	e): ess under the fictitious name (specify)	) <i>:</i>						
5.		except de (1)	olied with the fictitious business name med above is a natural person fendant (name): USA Waste of Califa business organization, form unknow a corporation an unincorporated entity (describe):	fornia, c.		exco (1) (2) (3)		a bus a coi	dant (name): siness organization, form unknown rporation nincorporated entity (describe):	
		(4) 🗌 a	a public entity (describe):			(4)		a pul	blic entity (describe):	
		(5) 🗌 (	other (specify):			(5)		othe	r (specify):	
	b. 🗌	(1)	fendant (name): a business organization, form unknow a corporation an unincorporated entity (describe): a public entity (describe):	d. n		(1) (2) (3) (4)		a bus a coi an ui	lant (name): siness organization, form unknown rporation nincorporated entity (describe): blic entity (describe):	
		(5)	other (specify):			(5)		othe	r (specify):	
6.		ue names o Doe def	about additional defendants who are n f defendants sued as Does are unkno rendants (specify Doe numbers): 1-50	wn to plaint )	tiff.			were	e the agents or employees of other	
	b. 🛭	_	defendants and acted within the scope iendants (specify Doe numbers): 1-50	_	ency	or em			ersons whose capacities are unknown	to
7.	_	plaintiff.	who are joined under Code of Civil Pr		ction	382 a		•	·	ιο
8.	This can a. b. c. d.	at least	roper court because one defendant now resides in its juriso cipal place of business of a defendant person or damage to personal proper pecify):	corporation	or u		-		-	
9.	☐ F a. ☐ b. ☐	has com	equired to comply with a claims statute aplied with applicable claims statutes, sed from complying because (specify):	or						

SHORT TITLE: Beck v. USA Waste of California, Inc., et al.	CASE NUMBER:
10. The following causes of action are attached and the statements above apply to each (exauses of action attached):  a. Motor Vehicle  b. General Negligence  c. Intentional Tort  d. Products Liability  e. Premises Liability  f. Other (specify):	each complaint must have one or more
11. Plaintiff has suffered  a.	
12. The damages claimed for wrongful death and the relationships of plaintiff to the case. Itself in Attachment 12.  b. as follows:	deceased are
13. The relief sought in this complaint is within the jurisdiction of this court.	
<ul> <li>14. Plaintiff prays for judgment for costs of suit; for such relief as is fair, just, and equitable a. (1)</li></ul>	
15.  The paragraphs of this complaint alleged on information and belief are as follows 2	(specify paragraph numbers):
Date: September 8, 2021	C. efund
Corey C. Garrard, Esq.	NATI IRE OF PLAINTIFF OR ATTORNEY)

SHORT TITLE:
Beck v. USA Waste of California, Inc, et al.

CAUSE OF ACTION—General Negligence

(number)

ATTACHMENT TO Complaint Cross - Complaint

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

GN-1. Plaintiff (name): Deanna Beck

alleges that defendant (name): USA Waste of California, Inc., a Delaware Corporation; and,

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): February 5, 2021

at (place): 1621 Hotel Circle South, San Diego, CA 92108

(description of reasons for liability):

SHORT TITLE: Beck v. USA Waste of California, Inc., et al.	CASE NUMBER:
TWO CAUSE OF ACTION—Motor Ve	hicle
(number)	
ATTACHMENT TO 🗵 Complaint 🗌 Cross - Complaint	
(Use a separate cause of action form for each cause of action.)	
Plaintiff (name): Deanna Beck	
MV- 1. Plaintiff alleges the acts of defendants were negligent; the acts were the legal and damages to plaintiff; the acts occurred	al (proximate) cause of injuries
on (date): February 5, 2021 at (place): 1621 Hotel Circle South, San Diego, CA 92108	
MV- 2. DEFENDANTS	
a.	Waste of California., a Delawar
☑ Does 1 to 50	
b. The defendants who employed the persons who operated a motor are (names):	r vehicle in the course of their employment
Does to	
c. The defendants who owned the motor vehicle which was operated	d with their permission are (names):
to	
d	
Does to	
<ul><li>Does to</li><li>The defendants who were the agents and employees of the other</li></ul>	defendants and acted within the scope
Of the agency were (names):	
□ Does to	
Does to to  f.	he reasons for the liability are
☐ Does to	Page5