

SHORT TITLE: Beck v. USA Waste of California, Inc., 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*): USA Waste of California, c. **except** defendant (*name*):
- (1) a business organization, form unknown (1) a business organization, form unknown
(2) a corporation (2) a corporation
(3) an unincorporated entity (*describe*): (3) an unincorporated entity (*describe*):

(4) a public entity (*describe*): (4) a public entity (*describe*):
(5) other (*specify*): (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*): 1-50 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*): 1-50 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: 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 (*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*):

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*):
 2

Date: September 8, 2021

Corey C. Garrard, Esq. _____
 (TYPE OR PRINT NAME)



 (SIGNATURE OF PLAINTIFF OR ATTORNEY)

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

ONE _____ **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*): Deanna Beck

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

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*): 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 Vehicle**
 (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 (proximate) cause of injuries and damages to plaintiff; the acts occurred

on (date): February 5, 2021
 at (place): 1621 Hotel Circle South, San Diego, CA 92108

MV- 2. DEFENDANTS

- a. The defendants who operated a motor vehicle are (names): USA Waste of California., a Delaware corporation, and
- Does 1 _____ to 50 _____
- b. The defendants who employed the persons who operated a motor vehicle in the course of their employment are (names):
- c. Does _____ to _____
- c. The defendants who owned the motor vehicle which was operated with their permission are (names):
- d. Does _____ to _____
- d. The defendants who entrusted the motor vehicle are (names):
- e. Does _____ to _____
- e. The defendants who were the agents and employees of the other defendants and acted within the scope Of the agency were (names):
- f. Does _____ to _____
- 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:

Does _____ to _____