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10 Attorneys for Plaintiff
11 Stephanie Sigourney Zamora

12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
13 **FOR THE COUNTY OF LOS ANGELES**

14 STEPHANIE SIGOURNEY ZAMORA, an
15 individual,

16 Plaintiff,

17 vs.

18 ANDREW NOWACZEK, an individual; and
19 DOES 1 through 25, inclusive,

20 Defendants.

Case No.: **24CHCV00430**

COMPLAINT FOR DAMAGES:

1. Negligence

Demand for Jury Trial

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23 Plaintiff Stephanie Sigourney Zamora brings a cause of action against Defendants, and
24 each of them, hereby alleging as follows:

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Electronically FILED by
Superior Court of California,
County of Los Angeles
2/13/2024 12:00 AM
David W. Slayton,
Executive Officer/Clerk of Court,
By I. Baytalyants, Deputy Clerk

1 1. Unless otherwise clearly delineated by the context, reference to the phrase, “at all
2 times mentioned herein,” includes the occurrence of the events and facts alleged in this Complaint.

3 2. At all times mentioned herein, Plaintiff Stephanie Sigourney Zamora was and is an
4 individual residing in the city of Sylmar, County of Los Angeles, State of California.

5 3. At all times mentioned herein, Defendant Andrew Nowaczek was and is an
6 individual residing in the city of Sunland, County of Los Angeles, State of California.

7 4. The true names and capacities, whether individuals, corporate, or otherwise of
8 Defendants, sued erroneously herein as Does 1 through 25, inclusive, are unknown to Plaintiff at
9 this time, who therefore sues said Defendants by such fictitious names and capacities. Plaintiff
10 will seek leave to amend this Complaint to include their true names when they have been
11 ascertained. Plaintiff is informed and believes, and upon such information and belief hereby
12 allege, that each of the Defendants sued herein as Does 1 through 25, inclusive, are negligent or in
13 some other manner liable or responsible for the events and happenings alleged in this Complaint
14 and by their conduct directly and proximately caused Plaintiff to sustain the injuries and damages
15 alleged herein.

16 5. Plaintiff is informed and believes, and thereupon alleges, that at all times
17 mentioned herein, Defendants, and each of them, including Does 1 through 25, inclusive, and each
18 of them, were the agents, servants, employees and/or joint ventures of their Co-Defendants, and
19 were, as such, acting within the course, scope, and authority of said agency, employment and/or
20 joint venture, and with the knowledge, consent, permission and/or ratification of each other, and
21 that each and every Defendant, as aforesaid, when acting as a principal, was negligent in the
22 selection and hiring of each and every other Defendant as an agent, employee and/or joint
23 venturer.

24 6. At all times mentioned herein, Defendants, and each of them, were the owners of a
25 motor vehicle driven by Defendant(s) at the time of the incident, and upon Plaintiff’s belief was
26 bearing vehicle identification number YV4102DL1M1727231, which at the time and place of the
27 of the accident hereinafter alleged, was owned, operated, entrusted, and maintained with the
28 permission and consent of the Defendants, and each of them.

1 7. Plaintiff re-alleges and incorporates by reference each allegation above as though
2 fully set forth herein.

3 8. On or about March 13, 2022, Plaintiff was travelling on the California Interstate 5
4 and California State Route 118 interchange located in the city of Pacoima, County of Los Angeles,
5 State of California.

6 9. At said time and place, Defendants, and each of them, so negligently, carelessly,
7 recklessly, wantonly, and unlawfully drove, operated, maintained, conducted, controlled and
8 entrusted said vehicle as to directly and proximately cause the same to collide with Plaintiff's
9 vehicle then and there while being operated by Plaintiff, as aforesaid, thereby causing Plaintiff to
10 sustain injuries and damages as alleged herein.

11 10. As a direct and proximate result of the negligent acts, conduct and omissions of the
12 Defendants, and each of them, Plaintiff was hurt and injured in her health, strength, and activity,
13 sustaining injury to her nervous system and person, all of which injuries have caused, and continue
14 to cause, Plaintiff great mental, physical, emotional, and nervous pain, suffering, and distress. As a
15 result of such injuries, Plaintiff has suffered general damages according to proof.

16 11. As a further proximate result of the negligence of Defendants, and each of them,
17 Plaintiff has incurred and will incur future medical and related expenses in amounts according to
18 proof.

19 12. As a further proximate result of the negligence of Defendants, and each of them,
20 Plaintiff has sustained loss of earnings and earning capacity, both past and future, in amounts
21 according to proof.

22 13. As a further proximate result of the negligence of Defendants, and each of them,
23 Plaintiff has sustained damage to property, including loss of use, and other related damages, in
24 amounts according to proof.

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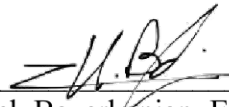
1 **PRAYER FOR RELIEF**

2 WHEREFORE, Plaintiff prays for judgment against Defendants, and each of them, as
3 follows:

- 4 1) For general damages according to proof;
5 2) For all medical, hospital and incidental expenses, according to proof;
6 3) For loss of earnings, past and future, and earning capacity according to proof;
7 4) For property damage and incidental expenses, according to proof;
8 5) For all prejudgment interest, according to proof;
9 6) For pretrial interest, according to statute;
10 7) For all costs of suit, according to proof; and
11 8) For such other and further relief as the Court may deem just and proper.

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15 Dated: February 12, 2024

C&B LAW GROUP LLP

16
17 By: 

18 Jack Bazerkanian, Esq.
19 Attorneys for Plaintiff
20 Stephanie Sigourney Zamora
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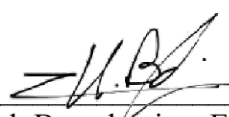
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JURY DEMAND

Plaintiff hereby demands a trial by jury on all claims so triable.

Dated: February 12, 2024

C&B LAW GROUP LLP

By: 

Jack Bazerkanian, Esq.
Attorneys for Plaintiff
Stephanie Sigourney Zamora