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16 Attorneys for PLAINTIFF

17 **Superior Court of the State of California**
18 **For the County of Riverside**

19 DAWN BRADLEY,
20
21 Plaintiff,

22 vs.

23 LINDSAY LOHAN; and DOES 1 to 5,
24 inclusive,
25 Defendants.

26 CASE NO. **INC 1105843**

27 **COMPLAINT FOR DAMAGES FOR:**

- 28
1. **Assault**
 2. **Battery**

Now comes Plaintiff, and as and for her claims and theories of relief, hereby alleges as follows:

COMMON ALLEGATIONS

1. The acts alleged herein took place at The Betty Ford Center, located at 39000 Bob Hope Drive, Rancho Mirage, CA 92270, which at the time was Plaintiff's employer.

COMPLAINT

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE

OWEN L. McINTOSH
JUL 21 2011

C. Walker-Turbyfill

LMA

JUL 22 2011

1 2. Defendants Does 1 through 5, inclusive, are sued herein under fictitious names. Their true
2 names and capacities are unknown to Plaintiff. When their true names and capacities are
3 ascertained, Plaintiff will amend this complaint by inserting their true names and capacities
4 herein. Plaintiff is informed and believes and thereon alleges that each of the fictitiously
5 named defendants is responsible in some manner for the occurrences herein alleged, and that
6 Plaintiff's damages as herein alleged were proximately caused by those defendants. Each
7 reference in this complaint to "defendant," "defendants," or a specifically named defendant
8 refers also to all defendants sued under fictitious names.

9 3. On December 12, 2010, Plaintiff reported for her shift as a chemical dependency technician
10 at the Betty Ford Center. Upon arrival, Plaintiff was notified that three female patients,
11 including Defendant, had jumped over the back wall surrounding their residence and left the
12 facility. At approximately 12:40 am, Plaintiff received a call from another technician to
13 come breathalyze these same patients per Betty Ford Center policy. When Plaintiff went to
14 the patients' residence, she found two of the three patients cooperative and honest, allowing
15 breathalyzer tests and admitting to drinking alcohol. Defendant was combative, refused to
16 breathalyze, yelled at the other patients not to talk to Plaintiff or the other technicians, and
17 cursed at Plaintiff when she asked Defendant to please come inside the house and
18 breathalyze. When Plaintiff attempted to escort one of the other patients to the tech office to
19 speak in private, Defendant pushed Plaintiff on her left shoulder. Plaintiff called another
20 technician for help, but Defendant insisted he leave the residence as he was male. Plaintiff
21 left with him, then returned to check on one of the other patients who had been upset. While
22 alone in another bedroom with the other two patients, Defendant walked in with a telephone
23 in her hand and other up to her ear and stated "the police want to talk to you." Plaintiff
24 attempted to speak with an officer, but Defendant had begun yelling in an out of control
25 manner. When Plaintiff informed the officer that she could not hear him because of
26 Defendant's yelling, Defendant threw the phone she was holding at Plaintiff. Plaintiff threw
27 her left hand up to block the phone, then Defendant grabbed Plaintiff's right wrist and tried to
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1 grab the phone out of Plaintiff's right hand, continuing to curse at Plaintiff and call her
2 derogatory names. In attempting to pull the phone out of Plaintiff's hand, Defendant grabbed
3 and pulled Plaintiff's right wrist, twisting it and pulling it for 8-10 seconds.

4 4. At no time did Plaintiff consent to any of the acts of Defendant alleged above.

5 5. As a proximate result of the acts of the Defendant as alleged above, Plaintiff suffered
6 significant injury to her wrist, requiring continued pain management and treatment, as well as
7 post-traumatic stress syndrome requiring several therapy sessions.

8 6. As a proximate result of the acts of defendant as alleged above, Plaintiff was hurt and injured
9 in her health, strength, and activity, sustaining injury to her nervous system and person all of
10 which have caused, and continue to cause, Plaintiff great mental, physical, and nervous pain
11 and suffering. Plaintiff is informed and believes and thereon alleges that these injuries will
12 result in some permanent disability to her. As a result, Plaintiff has suffered general
13 damages.

14 7. As a further proximate result of the acts of Defendant, Plaintiff, has incurred, and will
15 continue to incur, medical and related expenses. The full amount of these expenses is not
16 known to Plaintiff at this time.

17 8. The aforementioned conduct of Defendant was willful and malicious and was intended to
18 oppress and cause injury to Plaintiff. Plaintiff is therefore entitled to an award of punitive
19 damages.

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21 **FIRST CAUSE OF ACTION**

22 **ASSAULT**

23 *(Against All Defendants, and Each of Them)*

24 9. Plaintiff reasserts and realleges the allegations of paragraphs 1-8, supra, as if set forth in full
25 at this point.

26 10. In doing the acts as alleged above, Defendant intended to cause or to place Plaintiff in
27 apprehension of a harmful or an offensive contact with Plaintiff's person.

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COMPLAINT

- 1 11. As a result of Defendant's acts as alleged above, Plaintiff was, in fact, placed in great
2 apprehension of a harmful or offensive contact with Plaintiff's person, causing Plaintiff to
3 suffer general and special damages in an amount to be proven at trial.
- 4 12. The actions of Defendant as herein alleged were of such a reprehensible character, and were
5 deliberately directed by said Defendant at causing harm to Plaintiff so as to justify the award
6 of exemplary and punitive damages to punish said defendants, and to deter her from similar
7 wrongful conduct in the future.

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9 **SECOND CAUSE OF ACTION**

10 **BATTERY**

11 *(Against All Defendants, and Each of Them)*

- 12 13. Plaintiff reasserts and realleges the allegations of paragraphs 1-8 and 10-11 supra, as if set
13 forth in full at this point.
- 14 14. Immediately after placing Plaintiff in great apprehension of a harmful or offensive contact,
15 Defendant threw a phone at Plaintiff and then grabbed Plaintiff's wrist, pulling and twisting
16 it.
- 17 15. In doing the acts as alleged above, Defendant acted with the intent to make a contact with
18 Plaintiff's person. As a result, Plaintiff suffered general and special damages in an amount to
19 be proven at trial.
- 20 16. The actions of Defendant as herein alleged were of such a reprehensible character, and were
21 deliberately directed by said Defendant at causing harm to Plaintiff so as to justify the award
22 of exemplary and punitive damages to punish said defendants, and to deter her from similar
23 wrongful conduct in the future.

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25 **PRAYER**

26 Wherefore, Plaintiff prays for damages as follows:
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COMPLAINT

1 ON ALL HER CAUSES OF ACTION

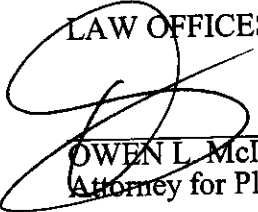
- 2 1. For general damages according to proof;
- 3 2. For medical and related expenses according to proof;
- 4 3. For costs of suit incurred herein;
- 5 4. For exemplary and punitive damages in an amount not less than one million dollars; and
- 6 5. For such other and further relief as the court may deem proper.

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8 Dated: July 20, 2011

LAW OFFICES OF OWEN L. McINTOSH

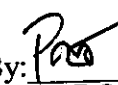
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10 
OWEN L. McINTOSH
11 Attorney for Plaintiff

12 Dated: July 20, 2011

13 PAUL ROLF JENSEN
ERIN BOECK
KATHARINE WOLFROM
14 JENSEN & ASSOCIATES, APC
Trial Lawyers

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16 By: 
17 PAUL ROLF JENSEN, Attorneys for Plaintiff

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COMPLAINT