

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, S. number, and address):

FOR COURT USE ONLY

April Bonjour
P.O. Box 843
Dunsmuir, CA
TELEPHONE NO.: 530-235-4147
E-MAIL ADDRESS (Optional):

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SISKIYOU

AUG 30 2011 ^{FW} 8395

ATTORNEY FOR (Name): IN PRO PER

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SISKIYOU

STREET ADDRESS: 311 4th Street
MAILING ADDRESS: P.O. Box 986
CITY AND ZIP CODE: Yreka, CA 96097
BRANCH NAME: Civil

By: R. Dick
DEPUTY CLERK

PLAINTIFF: April Bonjour

DEFENDANT: Pipedream Products Inc, et al

DOES 1 TO 20

COMPLAINT-Personal Injury, Property Damage, Wrongful Death

AMENDED (Number):

Type (check all that apply):

MOTOR VEHICLE OTHER (specify):
 Property Damage Wrongful Death
 Personal Injury Other Damages (specify):

Jurisdiction (check all that apply):

ACTION IS A LIMITED CIVIL CASE
Amount demanded does not exceed \$10,000
 exceeds \$10,000, but does not exceed \$25,000
 ACTION IS AN UNLIMITED CIVIL CASE (exceeds \$25,000)
 ACTION IS RECLASSIFIED by this amended complaint
 from limited to unlimited
 from unlimited to limited

CASE NUMBER:

SC CV PO 11-01 154

1. Plaintiff (name or names): April Bonjour

alleges causes of action against defendant (name or names): Pipedream Products Inc, et al

2. This pleading, including attachments and exhibits, consists of the following number of pages:

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.

SHORT TITLE:

Bonjour v. Pimedream Products Inc, et al

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):

Pipedream Products Inc

- (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): _____ 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): _____ 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:

Bonjour v. Pimedream Products Inc, et al

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):
Personal injury, emotional duress

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)):

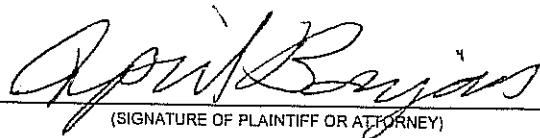
- (1) according to proof
- (2) in the amount of: \$

15. The paragraphs of this complaint alleged on information and belief are as follows (specify paragraph numbers):

Date: 08/08/2011

April Bonjour

(TYPE OR PRINT NAME)



(SIGNATURE OF PLAINTIFF OR ATTORNEY)

SHORT TITLE:

Bonjour v. Pimedream Products Inc, et al

ASE NUMBER:

1

CAUSE OF ACTION- Products Liability

Page 4

(number)

ATTACHMENT TO Complaint Cross-Complaint
(Use a separate cause of action form for each cause of action.)

Plaintiff (name): April Bonjour

Prod. L-1. On or about (date): 11/03/2010 plaintiff was injured by the following product:
Pipedreams Products sexual enhancement toy (vibrator/dildo)

Prod. L-2. Each of the defendants knew the product would be purchased and used without inspection for defects. The product was defective when it left the control of each defendant. The product at the time of injury was being
 used in the manner intended by the defendants.
 used in a manner that was reasonably foreseeable by defendants as involving a substantial danger not readily apparent. Adequate warnings of the danger were not given.

Prod. L-3. Plaintiff was a
 purchaser of the product. user of the product.
 bystander to the use of the product. other (specify):

PLAINTIFF'S INJURY WAS THE LEGAL (PROXIMATE) RESULT OF THE FOLLOWING:

Prod. L-4. Count One-Strict liability of the following defendants who
a. manufactured or assembled the product (names):
Pipedreams Products Inc.

Does 1 to 20
b. designed and manufactured component parts supplied to the manufacturer (names):
Pipedreams Products Inc.

Does 1 to 20
c. sold the product to the public (names):
Pipedreams Products Inc.

Does 1 to 20
Prod. L-5. Count Two-Negligence of the following defendants who owed a duty to plaintiff (names):
Pipedreams Products Inc.

Does 1 to 20
Prod. L-6. Count Three-Breach of warranty by the following defendants (names):

Does to
a. who breached an implied warranty
b. who breached an express warranty which was
 written oral

Prod. L-7. The defendants who are liable to plaintiffs for other reasons and the reasons for the liability are
 listed in Attachment-Prod. L-7 as follows:

SHORT TITLE:

NUMBER:

Bonjour v. Pipedream Products Inc., at a

1 On November 3, 2010 my boyfriend and I used a Pipedream Products
 2 vibrator/dildo during foreplay. During usage I felt an intense
 3 sharp pain inside of my vagina. My boyfriend quickly removed the
 4 toy, it was covered with blood. I thought, very briefly, that I
 5 had started my period but as the bleeding continued getting heavier
 6 and heavier I knew it was not my period. I went through all of my
 7 sanitary pads and was passing clots of blood. The bleeding slowed
 8 down when I was laying down but when I had to get up to change my
 9 pad I would pass a clot and then start bleeding again. I started
 10 to get faint from the loss of blood my boyfriend called 911. By the
 11 time they got there I was in and out of consciousness. My son was
 12 woken up so we could go to the hospital. He was terrified at the
 13 sight of me. He thought I was dying (quite frankly so did I). Once
 14 we got to the hospital I had lost so much blood I was given several
 15 pints of blood.

16 My family and myself have endured extreme emotional duress due to
 17 this episode. We have contacted the maker of the product to see
 18 what their compensation for the occurrence will be. They have
 19 denied my claim. It is for this reason I have initiated this
 20 lawsuit.

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 22
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 24
 25

26 (Required for verified pleading) The items on this page stated on information and belief are (specify item numbers, not line
 numbers):

27 This page may be used with any Judicial Council form or any other paper filed with the court.