

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State bar number, and address):
 THOMAS A. BRILL, ESQ. SBN 125356
 LAW OFFICES OF YOUNG & NICHOLS
 1901 TRUXTUN AVENUE
 BAKERSFIELD, CALIFORNIA 93301

TELEPHONE NO: (661) 861-7911 FAX NO. (Optional): (661) 861-7932
 E-MAIL ADDRESS (Optional): tbrill@youngnichols.com
 ATTORNEY FOR (Name): Plaintiff TERRI LYNN GROVES

FOR COURT USE ONLY

SUPERIOR COURT OF CALIFORNIA, COUNTY OF KERN
 STREET ADDRESS: 1415 TRUXTUN AVENUE
 MAILING ADDRESS: SAME
 CITY AND ZIP CODE: BAKERSFIELD, CALIFORNIA 93301
 BRANCH NAME: METROPOLITAN DIVISION - UNLIMITED CIVIL

FILED
 SUPERIOR COURT, METROPOLITAN DIVISION
 COUNTY OF KERN

APR 17 2012

TERRY McALY, CLERK
 BY *[Signature]* DEPUTY

PLAINTIFF: TERRI LYNN GROVES,

 DEFENDANT: LOGAN EARL STEVEN AUGUST, COUNTY OF KERN, and

 DOES 1 TO 100, inclusive,

COMPLAINT—Personal Injury, Property Damage, Wrongful Death
 AMENDED (Number):
 Type (check all that apply):
 MOTOR VEHICLE OTHER (specify): Intentional Infliction
 Property Damage Wrongful Death of Emotional Distress;
 Personal Injury Other Damages (specify): Invasion of Privacy

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:

S-1500-CV-276387 WDP

1. Plaintiff (name or names): TERRI LYNN GROVES,
 alleges causes of action against defendant (name or names): LOGAN EARL STEVEN AUGUST, COUNTY OF KERN,
 and DOES 1 to 100, inclusive,
2. This pleading, including attachments and exhibits, consists of the following number of pages: Five
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: GROVES vs. AUGUST

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): COUNTY OF KERN
 and DOES 1 to 25

- (1) a business organization, form unknown
- (2) a corporation
- (3) an unincorporated entity (describe):
- (4) a public entity (describe): County
- (5) other (specify):

c. except defendant (name): DOES 51 to 75

- (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): DOES 26 to 50

- (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): DOES 76 to 100

- (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 to 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): 51 to 100 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):

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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): Prejudgment interest pursuant to Civil Code, Section 3291.

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):
 All other acts or omissions by the following defendants which were the legal cause and/or a contributing cause of the injuries and damages to plaintiff; and DOES 1 to 100, inclusive.

Date: April 16, 2012

THOMAS A. BRILL, ESO.
 (TYPE OR PRINT NAME)


 (SIGNATURE OF PLAINTIFF OR ATTORNEY)

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FIRST 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): TERRI LYNN GROVES,

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): April 24, 2011

at (place): or near the intersection of Stockdale Highway and Stine Road, Bakersfield, Kern County, California. At said time and place, defendants, and each of them, did negligently and carelessly own, rent, lease, bail, operate, control, repair, maintain and entrust that certain 2008 Ford Crown Victoria automobile, bearing California license number 1246158, so as to cause the same to collide with a 2009 Kia Spectra automobile, bearing California license number 6JJC265, being operated by plaintiff, Terri Lynn Groves, thereby directly and proximately causing the damages complained of herein to plaintiff.

MV-2. DEFENDANTS

a. The defendants who operated a motor vehicle are (names): LOGAN EARL STEVEN AUGUST and

Does 1 to 100

b. The defendants who employed the persons who operated a motor vehicle in the course of their employment are (names): COUNTY OF KERN and

Does 1 to 100

c. The defendants who owned the motor vehicle which was operated with their permission are (names): COUNTY OF KERN and

Does 1 to 100

d. The defendants who entrusted the motor vehicle are (names): COUNTY OF KERN and

Does 1 to 100

e. The defendants who were the agents and employees of the other defendants and acted within the scope of the agency were (names):

Does 1 to 100

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 _____

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SECOND

(number)

CAUSE OF ACTION—Intentional Tort

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ATTACHMENT TO Complaint Cross-Complaint

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

IT-1. Plaintiff (name): TERRI LYNN GROVES,

alleges that defendant (name): LOGAN EARL STEVEN AUGUST, and

Does 1 to 30

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant intentionally caused the damage to plaintiff

on (date): April 24, 2011

at (place): Kern County, California.

(description of reasons for liability):

Defendant LOGAN EARL STEVEN AUGUST, and DOES 1 to 30, took photographs of plaintiff's naked body and published them on the internet, and in other places as well.

Defendants' actions constitute a violation of HPPA, and also an invasion of plaintiff's privacy.