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 County of Los Angeles
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 David W. Slayton,
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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, NORTHWEST DISTRICT

STEPHEN PAPER, an individual, RICHARD
 PAPER, an individual,

Plaintiffs,

v.

CITY OF LOS ANGELES, a public entity,
 JASON CHRISTOPHER STEVENSON, an
 individual and DOES 1 through 10, inclusive,

Defendants.

Case No. **24VECV03899**

COMPLAINT FOR DAMAGES:

1. NEGLIGENCE

DEMAND FOR JURY TRIAL

COMES NOW Plaintiffs STEPHEN PAPER and RICHARD PAPER ("PLAINTIFFS");
 for causes of actions against Defendants, CITY OF LOS ANGELES, a public entity, JASON
 CHRISTOPHER STEVENSON, an individual; and DOES 1-10, inclusive ("DEFENDANTS"),
 who complain and allege as follows:

GENERAL ALLEGATIONS

1. According to a recent study prepared for the Board of Police Commissioners, Los
 Angeles Police Department officers were involved in more than 1,000 collisions resulting in
 injuries or death over the last five years. The largest percentage of collisions with injuries were
 suffered by third-party victims. Unfortunately, there have been no signs that the widespread and
 well-documented unsafe driving practices of LAPD officers is getting any better. This case is

1 sadly about yet another LAPD officer causing another horrific and reckless crash causing severe
2 and life-threatening injuries to two victims on the evening of June 4, 2024.

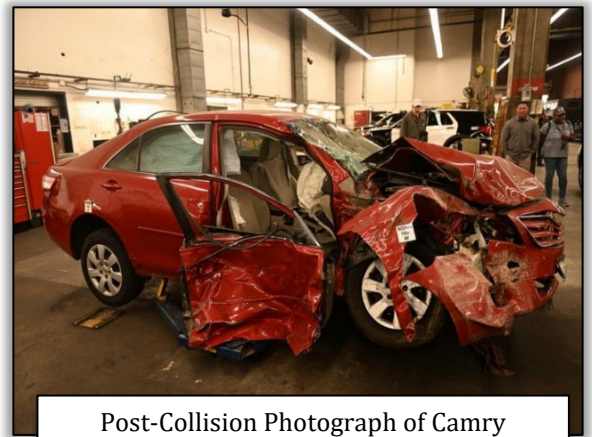
3 2. Shortly before 8 p.m. on June 4, 2024, LAPD Officer Jason Stevenson was driving
4 a 2015 black and white Ford Police Taurus in the course of duty as a police officer employed by
5 the City of Los Angeles traveling southbound on Balboa Boulevard approaching the intersection
6 with Burbank Boulevard. Based upon a preliminary investigation, Officer Stevenson was
7 inexplicably speeding at 80 mph in a 45 mph zone seconds before he crashed into the right side of
8 a red Toyota Camry that was traveling
9 northbound on Balboa negotiating a left turn on
10 westbound Burbank. Officer Stevenson was
11 neither in pursuit of any suspect nor did he have
12 his lights or sirens activated. There is no
13 rational explanation for his conduct. Ironically,
14 Officer Stevenson was assigned to the Valley
15 Traffic Division, Street Racing Task Force at the time.



Post-Collision Photograph of Police Vehicle

16 3. As a result of the crash, Stephen Paper, the driver of the Camry, and his brother,
17 Richard Paper, who was sitting in the front seat as a passenger, both sustained life-threatening
18 injuries and were transported to the ER by ambulance where doctors performed multiple surgeries
19 on them over the next several weeks.

20 4. The crash was so severe that after
21 Officer Stevenson slammed into Stephen Paper's
22 Camry at his high rate of speed, the Camry
23 rotated counterclockwise and crashed into a tri-
24 light pole then crashed into a property wall and
25 crashed again into an electrical control box
26 located on the southwest corner of the
27 intersection where it finally came to a rest.



Post-Collision Photograph of Camry

28 5. Another LAPD officer was assigned to investigate the crash and concluded that had

1 Officer Stevenson "been traveling at the speed limit (45 mph), from 445 feet away, Vehicle 1 (the
2 police car) would take 6.7 seconds to get to the Area of Impact, which is more than enough time
3 for Vehicle 2 (the Camry) to safely complete the maneuver; therefore, this crash would not have
4 occurred." Based on his investigation, the LAPD officer assigned to investigate this crash stated
5 the cause of this crash was Officer Stevenson's unsafe speed in violation of California Vehicle
6 Code Section 22350.

7 6. Plaintiff Stephen Paper, at all times relevant herein, was and is a resident of Los
8 Angeles County.

9 7. Plaintiff Richard Paper, at all times relevant herein, was and is a resident of
10 Minnesota.

11 8. Defendant CITY OF LOS ANGELES ("CITY"), at all times relevant herein, was a
12 public entity duly organized and existing under and by virtue of the laws of the State of California
13 and authorized to do, and is doing, business in the State of California with its principal place of
14 business in Solano County.

15 9. Defendant, Jason Stevenson ("STEVENSON"), at all times relevant herein, was
16 employed as a police officer with the Los Angeles Police Department and resides in the City of
17 Los Angeles.

18 10. Defendant CITY is a public entity, upon which Plaintiffs have, pursuant to
19 *Government Code* §§ 905 & 910 et seq., timely served with written government claims. Pursuant
20 to *Government Code* § 945.4, such government claims have been deemed to have been rejected by
21 Defendant CITY. Accordingly, Plaintiffs have standing to bring suit for monetary damages
22 against this public entity.

23 11. The true names and capacities, whether individual, plural, corporate, partnership,
24 associate, or otherwise, of DOES 1 through 10, inclusive, are unknown to Plaintiffs who therefore
25 sue said Defendants by such fictitious names. The full extent of the facts linking such fictitiously
26 sued Defendants is unknown to Plaintiffs. Plaintiffs are informed and believes, and thereon allege,
27 that each of the Defendants designated herein as a DOE was, and is, negligent, or in some other
28 actionable manner, responsible for the events and happenings hereinafter referred to, and thereby

1 negligently, or in some other actionable manner, legally and proximately caused the hereinafter
2 described injuries and damages to Plaintiffs. Plaintiffs will hereafter seek leave of the Court to
3 amend this Complaint to show the Defendants' true names and capacities after the same have been
4 ascertained.

5 12. Plaintiffs are informed and believe, and thereon allege, that at all times mentioned
6 herein, Defendants, and each of them, including DOES 1 through 10, inclusive, were agents,
7 servants, employees, successors in interest, and/or joint venturers of their co-Defendants, and
8 were, as such, acting within the course, scope, and authority of said agency, employment, and/or
9 venture, and that each and every Defendant, as aforesaid, when acting as a principal, was negligent
10 in the selection and hiring of each and every other defendant as an agent, servant, employee,
11 successor in interest, and/or joint venturer.

12 13. Plaintiffs are informed and believe, and thereon allege, that at all times mentioned
13 herein, Defendant STEVENSON was acting in the course and scope of his employment with
14 Defendant CITY and DOES 1 through 10, inclusive. Plaintiffs are further informed and believe,
15 and thereon allege, that Defendant STEVENSON was employed by and acting within the course
16 and scope of his employment with Defendant CITY and DOES 1 through 10, inclusive, as a Los
17 Angeles Police Department officer on the evening of June 4, 2024.

18 14. Plaintiffs are informed and believe, and thereon allege, that pursuant to California
19 *Government Code* §§ 815.2, 815.4, and 820(a), Defendant CITY and DOES 1 through 10,
20 inclusive, are vicariously liable for the actions and omissions of their employees, agents, or
21 independent contractors, including but not limited to, Defendants STEVENSON and DOES 1
22 through 10, inclusive, for any negligent acts or omissions that caused Plaintiffs' injuries.

23 **FIRST CAUSE OF ACTION**

24 **(Negligence by All Plaintiffs Against All Defendants and DOES 1 through 10, inclusive)**

25 15. Plaintiffs re-allege and incorporate herein by reference each and every allegation
26 and statement contained in the prior paragraphs.

27 16. Plaintiffs are informed and believe, and thereon allege, that at all times mentioned
28 herein, Defendant CITY and DOES 1 through 10, inclusive, were the lessees of, owners of, had an

1 ownership interest in, or otherwise had control over the patrol vehicle being driven by Officer
2 STEVENSON that caused Plaintiffs' severe injuries. Plaintiffs are further informed and believe,
3 and thereon allege, that at all times mentioned herein the subject patrol vehicle was being operated
4 and/or controlled by Defendant STEVENSON, with the consent, knowledge, and permission of
5 Defendant CITY and DOES 1 through 10, inclusive.

6 17. Plaintiffs are informed and believe, and thereon allege, that at all times mentioned
7 herein, Defendant STEVENSON was acting within the course and scope of his employment with
8 his employer, Defendant CITY and DOES 1 through 10, inclusive.

9 18. Plaintiffs are informed and believe, and thereon allege, that at all times mentioned
10 herein, Defendants CITY, STEVENSON and DOES 1 through 10, inclusive, had a duty to
11 operate, drive, control, entrust, service, and maintain that certain patrol vehicle in a reasonable
12 manner.

13 19. Plaintiffs are informed and believe, and thereon allege, that at all relevant times,
14 including at the time of impact, Plaintiff Stephen Paper was acting reasonably and driving safely
15 and lawfully.

16 20. Plaintiffs are informed and believe, and thereon allege, that Defendant CITY and
17 DOES 1 through 10, inclusive, were responsible for maintaining and discharging law enforcement
18 services in Los Angeles including in the area surrounding the subject incident at the intersection of
19 Balboa and Burbank. As part of those law enforcement services, Defendant CITY and DOES 1
20 through 10, inclusive, were aware that Los Angeles Police Department officers employed by
21 Defendant CITY would be required to navigate police cruisers through areas of Los Angeles in
22 close proximity to civilian motorists. Defendant CITY has a non-delegable duty to ensure that
23 civilian motorists are not injured by police officers operating police cruisers while in the course of
24 discharging law enforcement services in Los Angeles including in the area surrounding the subject
25 incident at the intersection.

26 21. Plaintiffs are informed and believe, and thereon allege, that, as a result of the
27 aforementioned conduct, Defendants CITY, STEVENSON and DOES 1 through 10, inclusive,
28 negligently and recklessly breached their duty to operate, drive, control, entrust, service, and

maintain the subject patrol vehicle in a safe and reasonable manner.

22. As a direct and proximate result of the grossly negligent conduct of Defendants and DOES 1 through 10, inclusive, Plaintiffs were caused to suffer severe and permanent injuries.

23. As a legal, direct and proximate result of the grossly negligent conduct of Defendants and DOES 1 through 10, inclusive, as aforesaid, Plaintiffs have incurred property and medical expenses in an amount to be stated according to proof, pursuant to Section 425.10 of the California *Code of Civil Procedure*.

24. As a legal, direct and proximate result of the grossly negligent conduct of Defendants and DOES 1 through 10, inclusive, Plaintiffs sustained non-economic damages, including, but not limited to, past and future physical pain and mental suffering, loss of enjoyment of life, disfigurement, physical impairment, inconvenience, grief, anxiety, humiliation, serious emotional distress, in an amount in excess of the jurisdictional minimum, according to proof, pursuant to Section 425.10 of the *California Code of Civil Procedure*.

25. As a legal, direct and proximate result of the grossly negligent conduct of Defendants and DOES 1 through 10, inclusive, Plaintiffs were compelled to, and did, employ the services of hospitals, physicians, surgeons, nurses, and the like, to care for and treat them, the exact amount of such losses to be stated according to proof, pursuant to Section 425.10 of the California *Code of Civil Procedure*.

26. As a legal, direct and proximate result of the grossly negligent conduct of Defendants and DOES 1 through 10, inclusive, as aforesaid, Plaintiffs suffered lost earning capacity, the exact amount of such losses to be stated according to proof, pursuant to Section 425.10 of the California *Code of Civil Procedure*.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray judgment against all Defendants as follows:

1. For general damages in an amount in excess of the jurisdictional minimum, according to proof;

2. For economic damages related to loss of earnings, lost earning capacity, and loss of financial support;

3. For economic damages including hospital, medical, professional, and incidental expenses, according to proof;
4. For pre-trial interest, according to proof;
5. For prejudgment interest, according to proof and
6. For such other and further relief as this Court may deem just and proper.

DATED: August 15, 2024

PANISH | SHEA | RAVIPUDI LLP


By: 
 Robert S. Glassman
 Attorneys for Plaintiffs

DEMAND FOR JURY TRIAL

Plaintiffs hereby demand a trial by jury as to all causes of action.

DATED: August 15, 2024

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By: 
 Robert S. Glassman
 Attorneys for Plaintiffs