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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **COUNTY OF LOS ANGELES**

10
11 THE ESTATE OF COSMO SILVERMAN, by
and through its Successors-in-Interest ADAM
12 SILVERMAN and LOUISE BONNET,
ADAM SILVERMAN, individually, and
13 LOUISE BONNET, individually,

14 Plaintiffs,

15 v.

16 CAMPBELL HALL, a corporation, and DOES
1-10, inclusive,

17 Defendants.
18

Case No.

COMPLAINT FOR DAMAGES:

**1. WRONGFUL DEATH –
NEGLIGENCE**

2. PREMISES LIABILITY

DEMAND FOR JURY TRIAL

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20 THE ESTATE OF COSMO SILVERMAN, by and through its Successors-in-Interest
21 ADAM SILVERMAN and LOUISE BONNET, ADAM SILVERMAN, individually, and
22 LOUISE BONNET, individually (“Plaintiffs”), bring causes of action against Defendant
23 CAMPBELL HALL and DOES 1-10, inclusive (“Defendants”), who complain and allege as
24 follows:

25 **GENERAL ALLEGATIONS**

26 1. On June 4, 2025, fifteen-year-old Campbell Hall student Cosmo Silverman was run
27 over and killed in the school’s parking lot minutes after finishing his freshman year. Had the
28 school acted on numerous prior complaints it received about the dangerous design and operation

1 of its Triangle Parking Lot, Cosmo would still be alive today. Instead, Campbell Hall waited until
 2 *after* Cosmo’s untimely death to make the much needed safety improvements to its parking lot that
 3 would have prevented this unthinkable tragedy.

4 2. Before Cosmo’s passing, the Triangle Parking Lot’s design and Campbell Hall’s
 5 student pickup protocol forced students to negotiate through lines of moving vehicle traffic with
 6 no designated pedestrian pathways, operating in clear violation of basic safety standards and
 7 creating the very dangers that took Cosmo’s life. Over the last 6 months, pre-trial investigation
 8 including extensive video footage obtained and vehicle Event Data Recorder (“EDR”) data
 9 extracted from multiple vehicles confirm exactly what transpired. Accordingly, before filing this
 10 lawsuit, the Silverman family attempted to resolve the matter informally with the school and avoid
 11 litigation. Those efforts were unsuccessful.

12 3. Campbell Hall’s pickup protocol ran flagrantly afoul of Title 5, Article 4, Section
 13 14030(b) of the California Code of Regulations—California’s foremost guidance and authority on
 14 school parking lot safety—and constituted an untenably dangerous lapse in school administrative
 15 judgement and oversight.

16 4. According to the Code, **vehicle traffic patterns must not interfere with foot**
 17 **traffic patterns.** *See* Cal. Cod. Regs. Tit. 5, Art. 4, §14030(b)(3) (emphasis added).

18 5. Campbell Hall’s pre-incident protocol blatantly violated this provision and well-
 19 established industry standard. Before the incident,
 20 students routinely weaved through multiple lanes of traffic
 21 to access parked cars or make their way to parents picking
 22 them up. Indeed, Cosmo was one of many students



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26 *Figure 1: Security footage captured the incident.*



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28 *Figure 2: The Rivian's dashboard camera shows the stream of pedestrian traffic (including Cosmo) negotiating through vehicular traffic immediately before the incident.*

1 navigating his way through a line of intermittently accelerating and stopping vehicles when he was
2 pinned and killed between a Rivian R1S and a Volvo SUV.

3 6. The Code also
4 provides that crosswalks must
5 be clearly marked to define
6 desired foot paths. As shown
7 in Figure 4, not only did
8 Campbell Hall’s parking lot
9 not have clearly marked
10 footpaths, it was entirely
11 devoid of them altogether.



Figure 3: Law enforcement investigation photography captured a gap in a hedge through which Cosmo and other students crossed to access the parking lot and pickup line.

12 This omission again forced students
13 to thread their way between moving
14 cars, exposing them daily to an
15 obvious and entirely preventable
16 hazard.

17 7. The Code further
18 establishes **that island fencing and**
19 **curbs must be used to separate**
20 **parking areas from**
21 **loading/unloading areas.** See Cal.
22 Cod. Regs. Tit. 5, Art. 4,
23 §14030(b)(4) (emphasis added).



Figure 4: An aerial photograph of Cambell Hall’s through lane, pickup lane, and parking lot prior to the incident. The red circle indicates the approximate area of the incident.

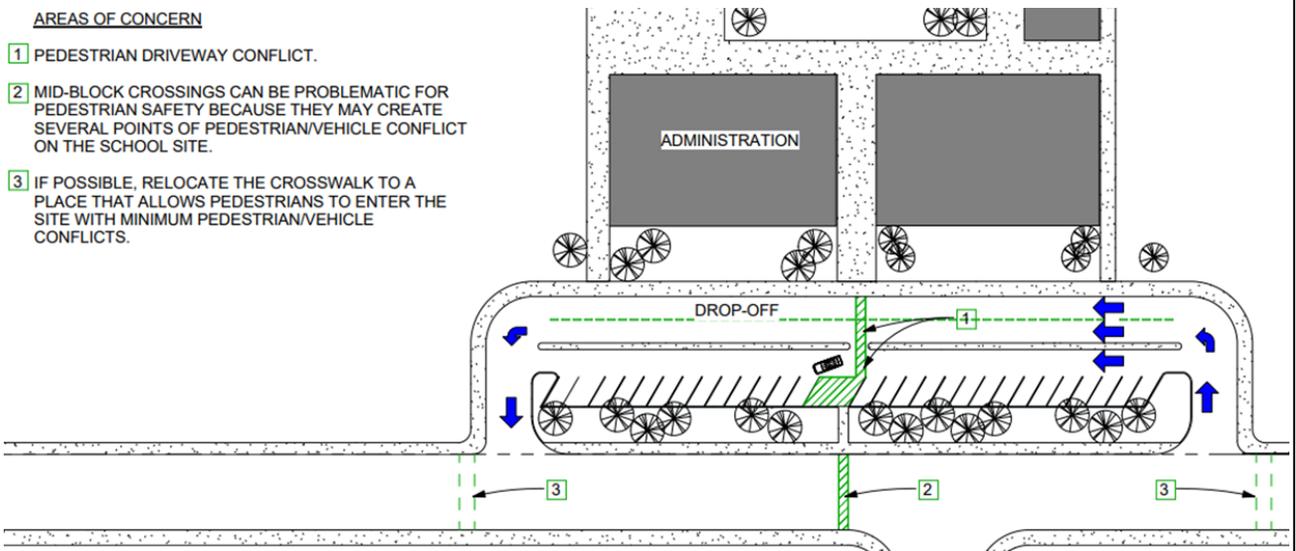
24 8. Campbell Hall failed
25 in this regard as well. The pickup line
26 wove around and surrounded the
27 nearby parking area, guaranteeing that
28 any student who wished to access a

1 parked car during pickup time would be forced to step through moving traffic.

2 9. The Partnership Alliance for Safer Schools’s recent white paper on best practices
 3 concerning school parking lot safety emphasizes that school pickup is an extremely busy time in
 4 school parking lots, as they fill with parents and students in cars and on-foot. According to the
 5 Alliance, it is therefore essential to use signage, parking lot painting, and stenciling to “clearly
 6 mark” pedestrian and traffic flow.

7 10. But as documented by LAPD Officer Matthew Heinzman on page 9 of the police
 8 report, “[t]here were no markings to indicate pedestrian flow” at the area of the incident
 9 (emphasis added).

10 11. Indeed, Campbell Hall’s pre-incident protocol strongly resembles a California
 11 Department of Education (“CDE”) example of exactly what not to do. The CDE’s website
 12 provides best practices for school parking lot design and safety. Under the “Best Practices to
 13 Avoid Pedestrian and Vehicular Conflicts” section, it provides the below diagram as an example
 14 of an unsafe school pickup scheme:



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 24 12. Like Campbell Hall’s pre-incident pickup configuration, the diagram depicts a
 25 protocol that forces pedestrians to cross active lanes of traffic to reach parked vehicles or the
 26 school entrance. Yet Campbell Hall’s design was even more dangerous because it lacked any
 27 pedestrian crosswalk at all, unlike the CDE example. It typifies the type of hazardous circulation
 28 pattern the CDE warns schools to avoid—a system employed by Campbell Hall prior to the

1 incident.
2 13. Campbell Hall was
3 also indisputably on notice of its
4 dangerous pickup protocol. As
5 shown in Figure 6, according to a
6 Campbell Hall parent who text
7 messaged Adam Silverman after the
8 incident, parents have “raised issues
9 many times about the safety of drop
10 off and pick up,” and Campbell Hall
11 was “on notice and would not change
12 things.” Campbell Hall’s unfortunate
13 and tragic disregard for persistent
14 safety warnings from its community
15 is indefensible.

16 14. And according to
17 information and belief, the Campbell
18 Hall employee usually responsible
19 for directing traffic in the parking lot
20 was not present on the day of
21 Cosmo’s death. This was also
22 reported publicly to media outlets.

23 15. The reality is plain for
24 all to see. Campbell Hall’s Triangle
25 Parking Lot and student pickup
26 protocol were manifestly dangerous
27 before the incident. Campbell Hall’s
28 community raised their concerns

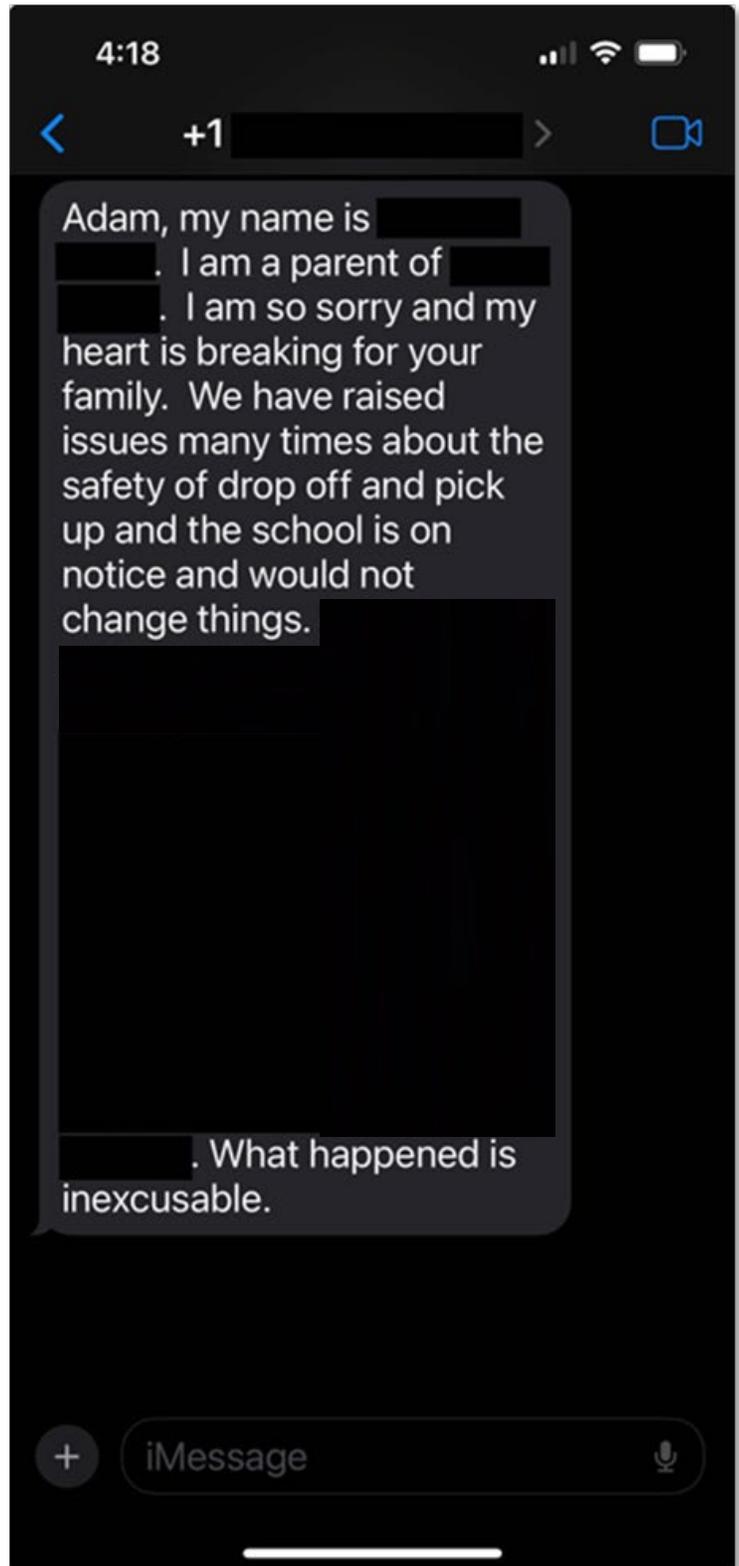


Figure 6: Campbell Hall received multiple safety complaints before Cosmo's death, as stated in this parent's text message.

1 many times, yet the school ignored them and made no safety improvements. Only after Cosmo
 2 Silverman’s death did Campbell Hall finally attempt to confront the obvious dangers it had
 3 previously disregarded.

4 16. As set forth below, Campbell Hall has now implemented a series of basic safety
 5 measures that should have been in place long before the incident ever happened.

6



19 17. The above images outlined in **red** show the Triangle Parking Lot and pickup area
 20 prior to the incident. The photographs outlined in **green** show the basic improvements that
 21 Campbell Hall made following Cosmo’s death:

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- 23
- A **fence** separating the pickup line from the lawn adjacent to the Garver Complex;
 - **Pylons** between that fence and the pickup line;
 - A stenciled **foot pathway** indicating where foot traffic should proceed through to the Triangle Parking Lot;
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- A stop sign in front of the foot pathway;
- A second fence partitioning the pickup lane from the through lane and rest of the Triangle Parking Lot.

18. Had these basic safety measures been implemented before June 4, 2025, Cosmo and his classmates would not have been able to walk in between the vehicular traffic waiting in the pickup line at the end of school, and this tragedy would have been averted.

19. The circumstances leading to this tragedy were entirely foreseeable. Campbell Hall’s pickup protocol posed an obvious and persistent danger—one repeatedly brought to the school’s attention by its own community. Yet the school failed to act. Only after Cosmo Silverman’s death did it take belated and elementary steps to remedy hazards that had long been apparent and contrary to best practices for maintaining safe school parking lots in California.

20. Cosmo was minutes after completing his ninth-grade school year. But during his tragically short life, he left an indelible mark on his family, his friends, and everyone fortunate enough to know him. No parent should ever have to bury their child, yet the Silverman family faced that unimaginable reality earlier this year. For Adam and Louise, the death of their son was



PARTIES

23. Decedent Cosmo Silverman was, at all times relevant, a resident of Los Angeles County.

24. Plaintiff ADAM SILVERMAN, at all times relevant herein, was a resident of Los Angeles County and is the surviving father of Decedent.

25. Plaintiff LOUISE BONNET, at all times relevant herein, was a resident of Los Angeles County and is the surviving mother of Decedent.

26. Plaintiffs ADAM SILVERMAN and LOUISE BONNET, at all times herein relevant, are Decedent's natural parents the surviving heirs of the Decedent COSMO SILVERMAN. ADAM SILVERMAN and LOUISE BONNET are the successors in interest for all purposes in this litigation pursuant to California *Code of Civil Procedure* section 377.60.

27. Decedent Cosmo Silverman would have been a plaintiff in this action had he survived. Cosmo Silverman's actions are brought by Plaintiffs ADAM SILVERMAN and LOUISE BONNET on behalf of their son pursuant to California Code of Civil Procedure Sections 377.10 to 377.35 inclusive.

28. Defendant CAMPBELL HALL, at all times herein relevant, is a California Corporation licensed to do business California.

29. The true names and capacities, whether individual, plural, corporate, partnership, associate, or otherwise, of DOES 1 through 10, inclusive, are unknown to Plaintiffs who therefore sue said defendants by such fictitious names. The full extent of the facts linking such fictitiously sued defendants is unknown to Plaintiffs. Plaintiffs are informed and believe, and thereupon allege, that each of the defendants designated herein as a DOE was, and is, negligent, or in some other actionable manner, responsible for the events and happenings hereinafter referred to, and thereby negligently, or in some other actionable manner, legally and proximately caused the hereinafter described injuries and damages to Plaintiffs. Plaintiffs will hereafter seek leave of the Court to amend this Complaint to show the defendants' true names and capacities after the same have been ascertained.

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FIRST CAUSE OF ACTION

(Wrongful Death Sounding in Negligence Brought by Plaintiffs Against Defendants)

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

31. Plaintiffs are informed and believe, and thereon allege, that at all times mentioned herein, a special relationship existed between Defendants CAMPBELL HALL and DOES 1 through 10, inclusive, and its students, including Decedent Cosmo Silverman resulting in an affirmative duty on the school district to exercise reasonable supervisory care for the safety of students entrusted to them and to take all reasonable steps to protect its students.

32. Plaintiffs are informed and believe, and thereupon allege, that at all times mentioned herein, Defendant CAMPBELL HALL and DOES 1 through 10, inclusive, owed a duty of care to all reasonably foreseeable people, including Decedent Cosmo Silverman, to supervise, protect, assist, and assist in the supervision and control and safety of minor students, such as Cosmo Silverman, and to protect minor students, including Decedent. This overall duty of care encompassed a duty to supervise all students on the school grounds, to enforce rules and regulations necessary for the protection of the students, and to take appropriate measures to protect students.

33. Plaintiffs are informed and believe, and thereupon allege, that at all times mentioned herein, while on Defendant CAMPBELL HALL’s campus, Decedent Cosmo Silverman was under the supervision of CAMPBELL HALL and its employees, who were obligated to provide the appropriate and mandatory level of oversight and protection for his safety.

34. Plaintiffs are informed and believe, and thereon allege, that at all times mentioned herein, Defendant CAMPBELL HALL and DOES 1 through 10, inclusive, breached their duty of care when they carelessly and negligently supervised, protected, assisted and assisted in the supervision and control and safety of Decedent Cosmo Silverman, a minor student enrolled in their school, which resulted in Decedent's injuries and untimely death for which Defendant CAMPBELL HALL and DOES 1 through 10, inclusive, are legally responsible.

35. Specifically, Plaintiffs are informed and believe, and thereon allege, that Defendant

1 CAMPBELL HALL and DOES 1 through 10, inclusive, breached their duty of care when they,
 2 among other negligent acts and omissions, designed, maintained, and operated the Triangle
 3 Parking Lot and student pickup protocol in a manner that forced students to walk through moving
 4 traffic lanes without any designated pedestrian pathways, failed to implement basic safety
 5 measures such as crosswalks or traffic controls, and disregarded repeated complaints warning that
 6 the school’s pickup system placed students at risk. These failures caused Cosmo Silverman’s
 7 untimely death, for which Defendant CAMPBELL HALL and DOES 1 through 10, inclusive, are
 8 legally responsible.

9 36. Decedent Cosmo Silverman did not die immediately and endured pain and suffering
 10 caused by Defendants’, including DOES 1-10s’, acts and/or admissions prior to his death.
 11 Pursuant to California *Code of Civil Procedure* section 377.34, Plaintiffs seek damages as
 12 Decedent’s successors-in-interest according to California Code of Civil Procedure section 377.11
 13 and Decedent’s heirs at law, for Decedent’s pain and suffering prior to his death.¹

14 37. As a legal, direct and proximate result of the intentional, reckless and negligent
 15 conduct of Defendants, including DOES 1 through 10, Plaintiff has sustained damages resulting
 16 from the loss of love, affection, society, service, comfort, support, right of support, expectations of
 17 future support and counseling, companionship, solace and mental support, as well as other benefits
 18 and assistance of Decedent, all to his general damages in a sum in excess of the jurisdictional
 19 limits of this Court, which will be stated according to proof, pursuant to Section 425.10 of the
 20 California *Code of Civil Procedure*.

21 38. As a legal, direct and proximate result of the conduct of Defendant, including
 22 DOES 1-10, inclusive, as aforesaid, Plaintiffs have incurred property, medical, funeral, and burial
 23 expenses in an amount to be stated according to proof, pursuant to Section 425.10 of the
 24 California *Code of Civil Procedure*.

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27 ¹ The statute entitling Plaintiffs to pre-death pain and suffering damages expires on January 1,
 28 2026, necessitating the filing of this action before that date.

SECOND CAUSE OF ACTION

(Premises Liability Brought by Plaintiffs Against Defendants)

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

40. Plaintiffs are informed and believe, and thereon allege, that at all times mentioned herein, Defendant CAMPBELL HALL and DOES 1-10, inclusive, owned, leased, maintained, managed, occupied, and/or controlled the Campbell Hall school campus, including the Triangle Parking Lot (“SUBJECT PREMISES”).

41. Plaintiffs are informed and believe, and thereon allege, that at all times mentioned herein, Defendant and DOES 1-10, inclusive, owed a duty of care to all reasonably foreseeable people, including Decedent Cosmo Silverman, to use, own, control and maintain the SUBJECT PREMISES in a reasonable manner.

42. Plaintiffs are informed and believe, and thereon allege, that at all times mentioned herein, Defendant CAMPBELL HALL and DOES 1-10, inclusive, carelessly, negligently, grossly negligently, and recklessly used, controlled, owned and maintained the SUBJECT PREMISES when they, among other acts and omissions, designed, maintained, and operated the Triangle Parking Lot and student pickup protocol in a manner that forced students to walk through moving traffic lanes without any designated pedestrian pathways, failed to implement basic safety measures such as crosswalks or traffic controls, and disregarded repeated complaints warning that the school’s pickup system placed students at risk. These failures caused Cosmo Silverman’s untimely death, for which Defendant CAMPBELL HALL and DOES 1 through 10, inclusive, are legally responsible.

43. Plaintiffs are informed and believe, and thereon allege, that at all times mentioned herein, the unsafe condition on the SUBJECT PREMISES, and that Defendants knew or, through the exercise of reasonable care, should have known about the unsafe condition, and that Defendant failed to remedy the unsafe condition, protect against harm from the condition, or give adequate warning of the condition.

44. Plaintiffs are informed and believe, and thereon allege, that the negligent, grossly

1 California Code of Civil Procedure section 377.34;

2 3. For past and future hospital, medical, professional and incidental expenses suffered
3 by Plaintiff, according to proof

4 4. For funeral and burial expenses suffered by Plaintiffs, according to proof;

5 5. For pre-judgment interest, according to proof;

6 6. For pre-trial interest, according to proof;

7 7. For such other and further relief as this Court may deem just and proper.

8
9 DATED: December 30, 2025

PANISH | SHEA | RAVIPUDI LLP

11
12 By: 
13 Robert S. Glassman
14 Joseph J. O'Hanlon
15 Attorney for Plaintiffs

16 **DEMAND FOR JURY TRIAL**

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

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19 DATED: December 30, 2025

PANISH | SHEA | RAVIPUDI LLP

21
22 By: 
23 Robert S. Glassman
24 Joseph J. O'Hanlon
25 Attorney for Plaintiffs