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19 SUPERIOR COURT OF THE STATE OF CALIFORNIA

20 COUNTY OF RIVERSIDE

21 MADELINE FOX, an individual, by and
22 through her Guardian ad Litem, MELISSA
23 FOX, LAUREN HINKLEY, Individually and
24 as Successor-in-Interest to GAVIN
25 HINKLEY, CORY HINKLEY, Individually
26 and as Successor-in-Interest to GAVIN
27 HINKLEY, and THE ESTATE OF GAVIN
28 HINKLEY, by and through Successors-in-
Interest LAUREN HINKLEY and CORY
HINKLEY

Plaintiffs,

v.

COUNTY OF RIVERSIDE, a public entity,
GLYNN ALLEN WILBURN, an individual,
SOUTHERN CALIFORNIA EDISON
COMPANY, a corporation, CITY OF
BEAUMONT, a public entity, CITY OF
CALIMESA, a public entity,
AMERICAN MEDICAL RESPONSE OF
SOUTHERN CALIFORNIA, a corporation,
and DOES 1 through 100, inclusive,
Defendants.

Case No. CVRI2507384

**PLAINTIFFS' FIRST AMENDED
COMPLAINT FOR DAMAGES**

1. **NEGLIGENCE**
2. **DANGEROUS CONDITION OF
PUBLIC PROPERTY**
3. **NEGLIGENCE**
4. **NEGLIGENCE – FAILURE TO
PROTECT/VOLUNTARY
UNDERTAKING**
5. **NEGLIGENCE**
6. **BAD FAITH/GROSS
NEGLIGENCE IN EMERGENCY
DISPATCH**
7. **WRONGFUL DEATH**

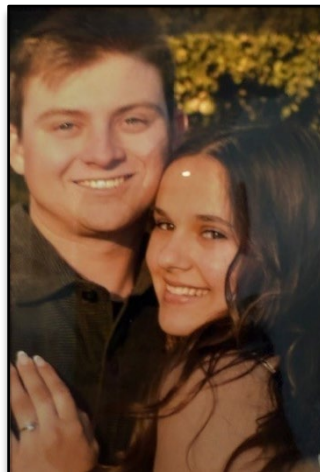
DEMAND FOR JURY TRIAL

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COME NOW Plaintiffs MADELINE FOX, by and through her Guardian ad Litem, MELISSA FOX (“MADELINE”), LAUREN HINKLEY, Individually and as Successor-in-Interest to GAVIN HINKLEY, CORY HINKLEY, Individually and as Successor-in-Interest to GAVIN HINKLEY, and THE ESTATE OF GAVIN HINKLEY, by and through Successors-in-Interest LAUREN HINKLEY and CORY HINKLEY (collectively “Plaintiffs”); for causes of actions against Defendants, COUNTY OF RIVERSIDE (“RIVERSIDE”), GLYNN ALLEN WILBURN (“WILBURN”), SOUTHERN CALIFORNIA EDISON COMPANY (“EDISON”), CITY OF BEAUMONT (“BEAUMONT”), CITY OF CALIMESA (“CALIMESA”), AMERICAN MEDICAL RESPONSE OF SOUTHERN CALIFORNIA (“AMR”), and DOES 1 through 100, inclusive (“Defendants”), and each of them, who complain and allege as follows:

GENERAL ALLEGATIONS

1. This case involves the tragic and preventable wrongful death of 21-year-old Gavin Hinkley (“Gavin”), and the severe life-threatening traumatic brain injury suffered by his 20-year-old fiancée, MADELINE. The young couple had a bright future together. They were set to be married a month after this horrific collision and were running errands for their wedding at the time of this horrific crash.



Gavin Hinkley & Madeline Fox

2. On September 6, 2025, Riverside County Sheriff’s Deputy WILBURN was driving a 2020 Ford Explorer patrol vehicle, bearing California license plate number 1585138 (“Patrol

1 Vehicle”) in the course and scope of his employment with the County of Riverside traveling
2 westbound on Cherry Valley Boulevard approaching the intersection with Roberts Street. He was
3 traveling in excess of 100 miles per hour on this street, approaching a signaled intersection with
4 Roberts Street. As he approached the red light, 5 seconds before the collision, he was still
5 traveling 100 miles per hour. At 2.0 seconds before the collision, he was traveling at 98.1 miles
6 per hour, his service brake and automatic braking system (ABS) were both off. In the next two
7 seconds, he allegedly decreased his speed but was still traveling at or in excess of 71.9 miles per
8 hour. In addition to speeding, WILBURN was also driving unreasonably when he crashed into the
9 left side of the 2018 Tesla Model 3 that was lawfully negotiating a left turn onto Cherry Valley
10 Boulevard from Roberts Street (the “Subject Collision”).

11 3. As a result of the crash, Gavin, who was driving, was killed and MADELINE, who
12 was sitting in the front seat as a passenger, sustained life-threatening and permanent injuries.

13 4. At all times herein mentioned, MADELINE was and is a resident of County of
14 Riverside, State of California. The Court has already appointed her mother, MELISSA FOX, as
15 her Guardian ad Litem.

16 5. Plaintiffs LAUREN HINKLEY and CORY HINKLEY (the “HINKLEYS”) bring
17 claims in dual capacities: individually, as statutory wrongful death claimants under *Code of Civil*
18 *Procedure* § 377.60, as the parents of decedent Gavin, who did not leave a surviving spouse or
19 children, seeking damages for the loss of their son’s love, companionship, comfort, care,
20 assistance, protection, affection, society, and moral support, as set forth in the Seventh Cause of
21 Action below; and as Successors-in-Interest to THE ESTATE OF GAVIN HINKLEY, seeking
22 damages that Gavin would have been entitled to recover had he survived, including pre-death pain
23 and suffering, pursuant to *Code of Civil Procedure* §§ 377.11, 377.30, and 377.34, as set forth in
24 the First through Sixth Causes of Action below.

25 6. Plaintiffs are informed and believe and thereupon allege that RIVERSIDE was and
26 is a duly formed governmental entity. RIVERSIDE and DOES 1 through 100, inclusive, have as a
27 purpose the responsibilities and duties to own, control, occupy, possess, lease, maintain, design,
28 supervise, patrol, inspect, operate, repair, construct, etc., certain roadways within the County of

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Riverside, including but not limited to Roberts Street at and about its intersection with Cherry Valley Boulevard, and to carry out the aforementioned responsibilities and duties in a safe manner according to good engineering practices so that the roadways are not defective and are in a safe condition for use by the public. RIVERSIDE and DOES 1 through 100, inclusive, are responsible for the receipt, processing, and dispatch of emergency services.

7. Plaintiffs are informed and believe and thereon allege that WILBURN, at all times relevant herein, was employed by RIVERSIDE as a law enforcement officer with the Riverside County Sheriff's Department and resides in the County of Riverside.

8. Plaintiffs are informed and believe and thereupon allege that EDISON, at all times relevant herein, was and is a California corporation with its principal place of business in Rosemead, California, authorized to do, has regularly done, and is doing, business within the County of Riverside, State of California.

9. Plaintiffs are informed and believe and thereupon allege that defendant BEAUMONT was and is a duly formed governmental entity. BEAUMONT and DOES 1 through 100, inclusive, have as a purpose the responsibilities and duties to own, control, occupy, possess, lease, maintain, design, supervise, patrol, inspect, operate, repair, construct, etc., certain roadways within the City of Beaumont, including but not limited to Roberts Street at and about its intersection with Cherry Valley Boulevard in the County of Riverside, State of California, and to carry out the aforementioned responsibilities and duties in a safe manner according to good engineering practices so that the roadways are not defective and are in a safe condition for use by the public. BEAUMONT and DOES 1 through 100, inclusive, are responsible for the receipt, processing, and dispatch of emergency services.

10. Plaintiffs are informed and believe and thereupon allege that CALIMESA was and is a duly formed governmental entity. CALIMESA and DOES 1 through 100, inclusive, have as a purpose the responsibilities and duties to own, control, occupy, possess, lease, maintain, design, supervise, patrol, inspect, operate, repair, construct, etc., certain roadways within the City of Calimesa, including but not limited to Roberts Street at and about its intersection with Cherry Valley Boulevard in the County of Riverside, State of California, and to carry out the

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aforementioned responsibilities and duties in a safe manner according to good engineering practices so that the roadways are not defective and are in a safe condition for use by the public. CALIMESA and DOES 1 through 100, inclusive, are responsible for the receipt, processing, and dispatch of emergency services.

11. Plaintiffs are informed and believe and thereon allege that AMR was and is a California corporation with its principal place of business in Lewisville, Texas, authorized to do, has regularly done, and is doing, business within the County of Riverside, State of California.

12. RIVERSIDE is a public entity, upon which Plaintiffs have, pursuant to *Government Code* §§ 905 and 910 et seq., timely served with written government claims. Accordingly, Plaintiffs have standing to bring suit for monetary damages against this public entity.

13. BEAUMONT is a public entity, upon which Plaintiffs have, pursuant to *Government Code* §§ 905 and 910 et seq., timely served with written government claims. Accordingly, Plaintiffs have standing to bring suit for monetary damages against this public entity.

14. CALIMESA is a public entity, upon which Plaintiffs have, pursuant to *Government Code* §§ 905 and 910 et seq., timely served with written government claims. Accordingly, Plaintiffs have standing to bring suit for monetary damages against this public entity.

15. The existence, true names, capacities, and/or facts establishing liability, of all defendants designated as DOES herein, whether individual, corporate, associate or otherwise are unknown to Plaintiffs, who therefore sue said defendants by such fictitious names. Plaintiffs are informed and believe and thereon allege that each of said defendants designated herein as a DOE is negligently responsible in some manner for the events and happenings herein referred to and negligently caused injury and damages proximately thereby to the Plaintiffs as herein alleged. Plaintiffs will ask leave of Court to amend this Complaint to set forth the true identity, names, capacities and facts creating liability of the fictitious defendants once they have been ascertained.

16. At all times herein mentioned, each defendant was the agent, servant, employee of the remaining defendants and was at all times acting with the course and scope of said agency, service and employment and further was acting at all times with the knowledge and consent of the remaining defendants, and that each and every defendant, as aforesaid, when acting as a principal,

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was negligent in the selection and hiring of each and every other defendant as an agent, servant, employee, successor in interest, and/or joint venturer.

17. The negligence of each defendant combined and cooperated with the negligence of the other defendants so as to cause the within described incident and resulting damages to said Plaintiffs.

18. At all times mentioned herein, defendant DOES 1 through 100, inclusive, include individuals, corporations, partnerships, sole proprietorships, contractors, subcontractors, etc., who at all times mentioned herein were either residents of the State of California and/or licensed to do business in the State of California. That at all times mentioned herein, Defendants DOES 1 through 100, inclusive, and each of them, were responsible, in part, for and did design, construct, own, control, maintain, operate, repair, inspect, lease, etc. the premises known as and located at Roberts Street at and about its intersection with Cherry Valley Boulevard, County of Riverside, State of California. At all times herein mentioned, defendant DOES 1 through 100, inclusive, were responsible for the receipt, processing, and dispatch of emergency services.

19. Plaintiffs are informed and believe, and thereon allege, that at all times mentioned herein, WILBURN was acting in the course and scope of his employment with RIVERSIDE and DOES 1 through 100, inclusive. Plaintiffs are further informed and believe, and thereon allege, that WILBURN was employed by and acting within the course and scope of his employment with RIVERSIDE and DOES 1 through 100, inclusive, as a Riverside County Sheriff Deputy on September 6, 2025.

20. Plaintiffs are informed and believe, and thereon allege, that pursuant to California Government Code §§ 815.2, 815.4, and 820(a), RIVERSIDE and DOES 1 through 100, inclusive, are vicariously liable for the actions and omissions of their employees, agents, or independent contractors, including but not limited to, WILBURN and DOES 1 through 100, inclusive, for any negligent acts or omissions that caused Plaintiffs' injuries and damages.

FIRST CAUSE OF ACTION

1 **(Negligence – By Plaintiff MADELINE FOX and THE ESTATE OF GAVIN HINKLEY**
2 **Against Defendants COUNTY OF RIVERSIDE, GLYNN ALLEN WILBURN, and DOES 1**
3 **through 100, Inclusive)**

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

6 22. Plaintiffs are informed and believe, and thereon allege, that at all times mentioned
7 herein, RIVERSIDE and DOES 1 through 100, inclusive, were the lessees of, owners of, had an
8 ownership interest in, or otherwise had control over the Patrol Vehicle being driven by WILBURN
9 that caused the death of Gavin and the severe injuries suffered by MADELINE. Plaintiffs are
10 further informed and believe, and thereon allege, that at all times mentioned herein the subject
11 patrol vehicle was being operated and/or controlled by WILBURN, with the consent, knowledge,
12 and permission of RIVERSIDE and DOES 1 through 100, inclusive.

13 23. Plaintiffs are informed and believe, and thereon allege, that at all times mentioned
14 herein, WILBURN was acting within the course and scope of his employment with his employer,
15 RIVERSIDE and DOES 1 through 100, inclusive.

16 24. Plaintiffs are informed and believe, and thereon allege, that at all times mentioned
17 herein, RIVERSIDE, WILBURN and DOES 1 through 100, inclusive, had a duty to operate,
18 drive, control, entrust, service, and maintain that certain patrol vehicle in a reasonable manner.

19 25. Plaintiffs are informed and believe, and thereon allege, that at all relevant times,
20 including at the time of impact, MADELINE and Gavin were acting reasonably and that Gavin
21 was driving safely and lawfully.

22 26. Plaintiffs are informed and believe, and thereupon allege, that at all relevant times,
23 including at the time of the impact, Gavin was lawfully driving a 2018 Tesla Model 3, bearing
24 license plate number 9AJZ026 (the “Tesla”), from Roberts Street onto Cherry Valley Boulevard.

25 27. Plaintiffs are informed and believe, and thereon allege, that RIVERSIDE
26 and DOES 1 through 100, inclusive, were responsible for maintaining and discharging law
27 enforcement services in the County of Riverside including in the area surrounding the subject
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1 incident at the intersection of Roberts Street and Cherry Valley Boulevard. As part of those law
 2 enforcement services, RIVERSIDE and DOES 1 through 100, inclusive, were aware that
 3 Riverside County Sheriff deputies employed by RIVERSIDE would be required to navigate patrol
 4 vehicles through areas of the County of Riverside in close proximity to civilian motorists.
 5 RIVERSIDE has a non-delegable duty to ensure that civilian motorists are not injured by law
 6 enforcement officers operating patrol vehicles while in the course of discharging law enforcement
 7 services in the County of Riverside including in the area surrounding the subject incident at the
 8 intersection.

9 28. Plaintiffs are informed and believe, and thereon allege, that, as a result of the
 10 aforementioned conduct, RIVERSIDE, WILBURN and DOES 1 through 100, inclusive,
 11 negligently and recklessly breached their duty to operate, drive, control, entrust, service, and
 12 maintain the subject patrol vehicle in a safe and reasonable manner.

13 29. As a direct, legal, and proximate result of the careless, negligent, grossly negligent,
 14 and unlawful conduct of RIVERSIDE, WILBURN and DOES 1 through 100, inclusive, Gavin
 15 died and MADELINE suffered severe and permanent injuries.

16 30. As a direct and foreseeable consequence of the above-described negligence,
 17 recklessness, and violations of law, MADELINE suffered catastrophic injuries, and Gavin suffered
 18 catastrophic injuries to his body, ultimately causing his wrongful death. The above-described
 19 negligence of RIVERSIDE, WILBURN, and DOES 1 through 100, inclusive, and each of them,
 20 was the direct cause of the Subject Collision and the direct and foreseeable cause of, and
 21 substantial factor in causing, Plaintiffs' damages.

22 31. As a direct, legal, and proximate result of the careless, negligent, and unlawful
 23 conduct of RIVERSIDE, WILBURN and DOES 1 through 100, which caused Gavin's death, THE
 24 ESTATE OF GAVIN HINKLEY, by and through Successors-in-Interest the HINKLEYS, is
 25 entitled to all survival damages accruing to Gavin prior to his death, including pre-death pain and
 26 suffering, loss of enjoyment of life, disfigurement, and physical impairment under *Code of Civil
 27 Procedure* § 377.34, and all special damages available at law.

28 32. As a legal, direct and proximate result of the grossly negligent conduct of

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RIVERSIDE, WILBURN, and DOES 1 through 100, inclusive, as aforesaid, Plaintiffs have incurred property and medical expenses in an amount to be stated according to proof, pursuant to *Code of Civil Procedure* § 425.10.

33. As a legal, direct and proximate result of the grossly negligent conduct of RIVERSIDE, WILBURN, and DOES 1 through 100, 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 *Code of Civil Procedure* § 425.10.

34. As a legal, direct and proximate result of the grossly negligent conduct of RIVERSIDE, WILBURN, and DOES 1 through 100, 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 *Code of Civil Procedure* § 425.10.

35. As a legal, direct and proximate result of the grossly negligent conduct of RIVERSIDE, WILBURN, and DOES 1 through 100, inclusive, as aforesaid, Plaintiffs suffered lost earning capacity, the exact amount of such losses to be stated according to proof, pursuant to *Code of Civil Procedure* § 425.10.

SECOND CAUSE OF ACTION

(Dangerous Condition of Public Property – By Plaintiff MADELINE FOX and THE ESTATE OF GAVIN HINKLEY Against Defendants COUNTY OF RIVERSIDE, CITY OF BEAUMONT, CITY OF CALIMESA, and DOES 1 through 100, Inclusive)

36. Plaintiffs repeat, re-allege, and incorporate paragraphs 1-20 as though fully set forth herein.

37. Plaintiffs are informed and believe and thereon allege that on or about September 6, 2025, and prior thereto, RIVERSIDE, BEAUMONT, CALIMESA, and DOES 1 through 100, inclusive, and each of them, owned, controlled, occupied, possessed, leased, maintained, permitted, regulated, designed, supervised, patrolled, inspected, operated, repaired, striped,

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constructed, and/or were otherwise responsible for Cherry Valley Boulevard at and about its intersection with Roberts Street, County of Riverside, State of California.

38. Plaintiffs are informed and believe, and thereon allege, that at all relevant times, including at the time of impact, MADELINE and Gavin were acting reasonably and that Gavin was driving safely and lawfully.

39. Plaintiffs are informed and believe, and thereupon allege, that at all relevant times, including at the time of the impact, Gavin was lawfully driving the Tesla from Roberts Street onto Cherry Valley Boulevard, located in the County of Riverside, State of California.

40. Plaintiffs are informed and believe, and thereon allege, that at all relevant times, WILBURN was traveling westbound on Cherry Valley Boulevard approaching Roberts Street in the County of Riverside, State of California.

41. At all times mentioned here, RIVERSIDE, BEAUMONT, CALIMESA, and DOES 1 through 100, inclusive, and each of them, were bound to exercise reasonable care to keep the aforementioned roadways free of dangerous conditions.

42. On or about September 6, 2025, and prior thereto, RIVERSIDE, BEAUMONT, CALIMESA, and DOES 1 through 100, inclusive, negligently, carelessly, and/or recklessly breached their duty to Plaintiffs and caused and/or allowed the aforementioned premises to be in a dangerous and defective condition and caused and/or allowed dangerous conditions of public property to exist, in that, among other things, Defendants, and each of them:

- a. Owned, controlled, operated, occupied, possessed, leased, maintained, designed, supervised, patrolled, inspected, repaired, striped, constructed the said premises so as to allow a dangerous and defective condition of the roadway to exist on said premises, including, but not limited to the failure to provide for adequate sight distance at the intersection, including but not limited to corner sight distance, decision sight distance, stopping sight distance, etc.;
- b. Negligently allowed dangerous visual obstructions on the northeast corner of the subject intersection including utility boxes, equipment, and other

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- visual obstructions.
- c. Failed to own, control, maintain, repair, and construct the public property in a safe condition;
 - d. Failed to keep unsafe areas posted with warning devices and signs;
 - e. Failed to have competent supervisory personnel to oversee, supervise, inspect the premises for dangerous conditions;
 - f. Failed to have adequate safety systems and/or measures in place;
 - g. Created and/or allowed a dangerous condition to exist on said premises;
 - h. Failed to provide traffic and/or warning signals, signs, markings, striping, controls, and devices;
 - i. Breached various mandatory duties to prevent injuries to Plaintiffs, as will be set forth herein in more detail, contained in the *California Manual of Uniform Traffic Control Devices*; *Caltrans Highway Design Manual*, including but not limited to Chapter 200 and Chapter 400; AASHTO, *Geometric Design of Highways & Streets*; Design Standards for safe stopping distances and sight distance requirements;
 - j. Failed to hire and employ competent and careful contractors, subcontractors, etc.;
 - k. Failed to warn the public, of which Plaintiffs are a part, who lawfully came upon said public property of the dangerous condition of the property created by the unsafe and defective condition of the public property;
 - l. Failed to operate, design, inspect, repair, maintain, construct said premises in accordance with generally accepted engineering practice and standards;
 - m. Failed to operate, design, inspect, repair, maintain, construct said premises according to plan;
 - n. Failed to operate, design, inspect, repair, maintain, and construct said premises with regard to the accident history at this location;
 - o. Failed to provide appropriate markings, striping, warning lights, parking

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restrictions, traffic signal timing, etc. in accordance with generally accepted engineering practices and standards;

- p. Failed to properly design, construct, repair, maintain, inspect, paint, stripe, etc., the roadway surface so as to allow a dangerous and defective condition to exist on the roadways, including but not limited to inadequate sight distance at the intersection, inadequate corner sight distance, decision sight distance, stopping sight distance, traffic signal timing;
- q. Failed to inspect, repair, design, construct, maintain, the intersection of Roberts Street and Cherry Valley Boulevard so as to create, maintain, and allow utility boxes at the intersection of Roberts Street and Cherry Valley Boulevard thereby further compounding the inadequate sight distance at the intersection;
- r. Failure to properly design, construct, maintain, inspect, repair, stripe, etc., the intersection of Roberts Street and Cherry Valley Boulevard so as to create, maintain and allow a dangerous and unsafe roadway slope on Cherry Valley Boulevard contributing to the inadequate sight distance at the intersection;
- s. Failure to properly inspect, repair and/or maintain the intersection of Cherry Valley Boulevard and Roberts Street, including but not limited to the failure to trim and/or remove the trees and/or other plants at the intersection of Cherry Valley Boulevard and Roberts Street thereby compounding the inadequate sight distance.
- t. Failure to properly inspect, repair and/or maintain the intersection and/or take any actions to make the intersection safe in light of the inadequate sight distance, heavy slope of Cherry Valley Boulevard, utility boxes, accident history, traffic signal timing, pavement markings, at the intersection;

43. On or about September 6, 2025, and prior thereto, said property was in a dangerous and defective condition, as aforementioned, and the operations conducted on said

1 roadways were conducted in a negligent and dangerous manner, all of which created a dangerous
2 condition on public property and created a substantial risk of injury to Plaintiffs when the
3 roadways were used in a proper and/or reasonably foreseeable manner.

4 44. On or about September 6, 2025, and prior thereto, it was reasonably
5 foreseeable that such dangerous and defective conditions and operations were unsafe and there
6 were no warning signs of such fact, and such danger would not be reasonably apparent to and
7 would not be anticipated by persons using due care. It was reasonably foreseeable, therefore, that
8 the dangerous and defective conditions and operations would cause the injuries and damages
9 herein alleged to have been suffered by Plaintiffs, as set forth above. Further, the failure to provide
10 warnings of the dangerous and defective conditions created a trap for those persons, including
11 Plaintiffs, who were using the premises in a safe manner and/or reasonably foreseeable manner.

12 45. That said dangerous and defective conditions and operations described above
13 created a reasonably foreseeable risk of the kind of injuries which are set forth herein, and
14 RIVERSIDE, BEAUMONT, CALIMESA, and DOES 1 through 100, inclusive, and each of them,
15 had or reasonably should have had knowledge of the existence of the conditions and/or operations
16 and knew, or should have known of its dangerous character a sufficient period of time prior to the
17 date of September 6, 2025, so as to have corrected the dangerous and defective conditions and
18 operations and/or so as to have provided adequate warnings of the dangerous and defective
19 conditions of the premises.

20 46. As a direct and proximate result of the conduct of RIVERSIDE, BEAUMONT,
21 CALIMESA, and DOES 1 through 100, inclusive, and each of them, and of the dangerous and
22 defective conditions existing on the public property and the failure to warn of the dangerous and
23 defective conditions, MADELINE and Gavin while lawfully operating their vehicle into the
24 intersection of Cherry Valley Boulevard and Roberts Street, were struck by the Patrol Vehicle
25 traveling westbound on Cherry Valley Boulevard, in the County of Riverside, thereby suffering
26 death and the serious and permanent personal injuries and damages as previously alleged.

27 47. As a direct and foreseeable consequence of the dangerous condition, MADELINE
28 suffered catastrophic injuries to her body, and Gavin suffered catastrophic injuries to his body,

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ultimately causing his wrongful death. The above-described dangerous condition was the direct cause of the Subject Collision and the direct and foreseeable cause of, and substantial factor in causing, MADELINE’s profound injuries, and Gavin’s profound injuries, resulting in his death and Plaintiffs’ damages.

48. As a direct, legal, and proximate result of the dangerous condition, which caused Gavin’s death, THE ESTATE OF GAVIN HINKLEY, by and through Successors-in-Interest the HINKLEYS, is entitled to all survival damages accruing to Gavin prior to his death, including pre-death pain and suffering, loss of enjoyment of life, disfigurement, and physical impairment under *Code of Civil Procedure* § 377.34, and all special damages available at law.

49. As a legal, direct and proximate result of the dangerous condition, as aforesaid, Plaintiffs have incurred property and medical expenses in an amount to be stated according to proof, pursuant to *Code of Civil Procedure* § 425.10.

50. As a legal, direct and proximate result of the dangerous condition, 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 *Code of Civil Procedure* § 425.10.

51. As a legal, direct and proximate result of the dangerous condition, 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 *Code of Civil Procedure* § 425.10.

52. As a legal, direct and proximate result of the dangerous condition, as aforesaid, Plaintiffs suffered lost earning capacity, the exact amount of such losses to be stated according to proof, pursuant to *Code of Civil Procedure* § 425.10.

THIRD CAUSE OF ACTION

**(Negligence – By Plaintiff MADELINE FOX and THE ESTATE OF GAVIN HINKLEY
Against Defendants SOUTHERN CALIFORNIA EDISON COMPANY and DOES 1
through 100, Inclusive)**

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53. Plaintiffs repeat and re-allege paragraphs 1-20 contained in Plaintiffs' complaint as though set forth herein verbatim.

54. At all times mentioned herein, EDISON and DOES 1 through 100, inclusive, include individuals, corporations, partnerships, sole proprietorships, contractors, subcontractors, business entities of unknown origin, who at all times mentioned herein were either residents of the State of California and/or licensed to do business in the State of California. That at all times mentioned herein, EDISON and DOES 1 through 100, inclusive, and each of them, were responsible, in part, for and did design, construct, own, control, maintain, manage, operate, occupy, repair, inspect, install, lease, and/or possess, the utility equipment, transformer and/or utility boxes, and/or the adjacent real property located at Cherry Valley Boulevard at and near the intersection with Roberts Street, County of Riverside, State of California.

55. On or about September 6, 2025, EDISON and DOES 1 through 100, inclusive, so carelessly, recklessly, and negligently designed, constructed, owned, operated, maintained, managed, occupied, repaired, inspected, installed, leased, controlled, and/or possessed, the above-mentioned utility equipment, transformer and/or utility boxes, and/or the adjacent real property, so as to cause, permit and/or allow dangerous conditions to exist on said premises, including but not limited to, improper and inadequate corner and decision sight distance, overgrown and untrimmed trees and plants, improperly and unsafely installed utility boxes and equipment. The dangerous and defective condition of the premises posed a substantial danger to the public lawfully using the roadways, including MADELINE and Gavin.

56. On or about September 6, 2025, MADELINE and Gavin, while at all times lawfully entering the intersection of Cherry Valley Boulevard and Roberts Street, were caused to suffer death and serious and permanent injuries, as set forth above, as a result of the negligence, recklessness, and carelessness of EDISON and DOES 1 through 100, inclusive, and each of them, as aforementioned.

57. As a direct and proximate result of the conduct of EDISON and DOES 1 through 100, inclusive, and each of them, and of the dangerous and defective conditions existing at or near the intersection of Cherry Valley Boulevard and Roberts Street, MADELINE and Gavin while

1 lawfully operating their vehicle into the intersection of Cherry Valley Boulevard and Roberts
2 Street, were struck by the Patrol Vehicle traveling westbound on Cherry Valley Boulevard, in the
3 County of Riverside, thereby suffering death and the serious and permanent personal injuries and
4 damages as previously alleged.

5 58. As a direct, legal, and proximate result of the negligent, careless, and unlawful
6 conduct of EDISON and DOES 1 through 100, inclusive, Gavin died and MADELINE suffered
7 severe and permanent injuries.

8 59. As a direct and foreseeable consequence of the above-described negligence,
9 recklessness, and violations of law, MADELINE suffered catastrophic injuries, and Gavin suffered
10 catastrophic injuries to his body, ultimately causing his wrongful death. The above-described
11 negligence of EDISON and DOES 1 through 100, inclusive, and each of them, was the direct
12 cause of the Subject Collision and the direct and foreseeable cause of, and substantial factor in
13 causing, MADELINE's profound injuries, and Gavin's profound injuries, resulting in his death
14 and Plaintiffs' damages.

15 60. As a direct, legal, and proximate result of the careless, negligent, and unlawful
16 conduct of EDISON and DOES 1 through 100, inclusive, which caused Gavin's death, THE
17 ESTATE OF GAVIN HINKLEY, by and through Successors-in-Interest the HINKLEYS, is
18 entitled to all survival damages accruing to Gavin prior to his death, including pre-death pain and
19 suffering under *Code of Civil Procedure* § 377.34, and all special damages available at law.

20 61. As a legal, direct and proximate result of the grossly negligent conduct of
21 EDISON and DOES 1 through 100, inclusive, as aforesaid, Plaintiffs have incurred property and
22 medical expenses in an amount to be stated according to proof, pursuant to *Code of Civil*
23 *Procedure* § 425.10.

24 62. As a legal, direct and proximate result of the grossly negligent conduct of
25 EDISON and DOES 1 through 100, inclusive, Plaintiffs sustained non-economic damages,
26 including, but not limited to, past and future physical pain and mental suffering, loss of enjoyment
27 of life, disfigurement, physical impairment, inconvenience, grief, anxiety, humiliation, serious
28 emotional distress, in an amount in excess of the jurisdictional minimum, according to proof,

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pursuant to *Code of Civil Procedure* § 425.10.

63. As a legal, direct and proximate result of the grossly negligent conduct of EDISON and DOES 1 through 100, 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 *Code of Civil Procedure* § 425.10.

64. As a legal, direct and proximate result of the grossly negligent conduct of EDISON and DOES 1 through 100, inclusive, as aforesaid, Plaintiffs suffered lost earning capacity, the exact amount of such losses to be stated according to proof, pursuant to *Code of Civil Procedure* § 425.10.

FOURTH CAUSE OF ACTION

(Negligence – Failure to Protect/Voluntary Undertaking – By Plaintiff MADELINE FOX and THE ESTATE OF GAVIN HINKLEY Against Defendants COUNTY OF RIVERSIDE, GLYNN ALLEN WILBURN, CITY OF BEAUMONT, CITY OF CALIMESA, and DOES 1 through 100, Inclusive)

65. Plaintiffs repeat, re-allege, and incorporate paragraphs 1-20 as though fully set forth herein.

66. Plaintiffs are informed and believe, and thereupon allege, that after the Subject Collision, RIVERSIDE, WILBURN, BEAUMONT, CALIMESA, and DOES 1 through 100, inclusive, and each of them, while acting within the course and scope of their employment, owed a duty to all reasonably foreseeable people, including Plaintiffs, to exercise reasonable care and/or to refrain from bad faith and gross negligence in implementing basic operational policies and voluntarily undertaking to manage, assume control of, and secure the scene of the Subject Collision.

67. Plaintiffs are informed and believe, and thereon allege, that after the Subject Collision, RIVERSIDE, WILBURN, BEAUMONT, CALIMESA, and DOES 1 through 100, inclusive, and each of them, carelessly, negligently, recklessly, and/or in bad faith or with gross negligence voluntarily undertook to manage, assume control of, and/or secure the scene of the

1 Subject Collision so as to breach their duty of care owed to all reasonably foreseeable people,
2 including Gavin and MADELINE, increasing the risk of harm to Gavin and MADELINE, placing
3 Gavin and MADELINE in a worse position than if RIVERSIDE, WILBURN, BEAUMONT,
4 CALIMESA, and DOES 1 through 100, inclusive, had not acted at all, thereby legally and
5 proximately causing Gavin's death and Plaintiffs' damages. RIVERSIDE, WILBURN,
6 BEAUMONT, CALIMESA, and DOES 1 through 100, inclusive, took affirmative steps to divert
7 life-saving medical care away from Gavin and MADELINE. By voluntarily undertaking these
8 responsibilities to manage, control, and secure the scene of the Subject Collision, RIVERSIDE,
9 WILBURN, BEAUMONT, CALIMESA, and DOES 1 through 100, inclusive, created a special
10 relationship with MADELINE and Gavin, giving rise to a duty of care to perform these
11 undertakings with reasonable diligence and without increasing the risk of harm to the victims.

12 68. As a direct, legal, and proximate result of the conduct of
13 RIVERSIDE, WILBURN, BEAUMONT, CALIMESA, and DOES 1 through 100, inclusive, and
14 each of them, Gavin died and MADELINE suffered severe and permanent injuries.

15 69. As a direct and foreseeable consequence of the above-described conduct,
16 MADELINE suffered catastrophic injuries, and Gavin suffered catastrophic injuries to his body,
17 ultimately causing his wrongful death. The above-described conduct of RIVERSIDE, WILBURN,
18 BEAUMONT, CALIMESA, and DOES 1 through 100, inclusive, and each of them, was the direct
19 and foreseeable cause of, and substantial factor in causing, MADELINE's profound injuries, and
20 Gavin's profound injuries, resulting in his death and Plaintiffs' injuries and damages.

21 70. As a direct, legal, and proximate result of the careless, negligent, bad faith, grossly
22 negligent, and unlawful conduct of RIVERSIDE, WILBURN, BEAUMONT, CALIMESA, and
23 DOES 1 through 100, inclusive, which caused Gavin's death, THE ESTATE OF GAVIN
24 HINKLEY, by and through Successors-in-Interest the HINKLEYS, is entitled to all survival
25 damages accruing to Gavin prior to his death, including pre-death pain and suffering under *Code*
26 *of Civil Procedure* § 377.34, and all special damages available at law.

27 71. As a legal, direct and proximate result of the conduct of RIVERSIDE, WILBURN,
28 BEAUMONT, CALIMESA, and DOES 1 through 100, inclusive, as aforesaid, Plaintiffs have

1 incurred property and medical expenses in an amount to be stated according to proof, pursuant to
 2 *Code of Civil Procedure* § 425.10.

3 72. As a legal, direct and proximate result of the conduct of
 4 RIVERSIDE, WILBURN, BEAUMONT, CALIMESA, and DOES 1 through 100, inclusive,
 5 Plaintiffs sustained non-economic damages, including, but not limited to, past and future physical
 6 pain and mental suffering, loss of enjoyment of life, disfigurement, physical impairment,
 7 inconvenience, grief, anxiety, humiliation, serious emotional distress, in an amount in excess of
 8 the jurisdictional minimum, according to proof, pursuant to *Code of Civil Procedure* § 425.10.

9 73. As a legal, direct and proximate result of the grossly negligent conduct of
 10 RIVERSIDE, WILBURN, BEAUMONT, CALIMESA, and DOES 1 through 100, inclusive,
 11 Plaintiffs were compelled to, and did, employ the services of hospitals, physicians, surgeons,
 12 nurses, and the like, to care for and treat them, the exact amount of such losses to be stated
 13 according to proof, pursuant to *Code of Civil Procedure* § 425.10.

14 74. As a legal, direct and proximate result of the grossly negligent conduct of
 15 RIVERSIDE, WILBURN, BEAUMONT, CALIMESA, and DOES 1 through 100, inclusive, as
 16 aforesaid, Plaintiffs suffered lost earning capacity, the exact amount of such losses to be stated
 17 according to proof, pursuant to *Code of Civil Procedure* § 425.10.

18 **FIFTH CAUSE OF ACTION**

19 **(Negligence – By Plaintiff MADELINE FOX and THE ESTATE OF GAVIN HINKLEY**
 20 **Against Defendants AMERICAN MEDICAL RESPONSE OF SOUTHERN CALIFORNIA,**
 21 **and DOES 1 through 100, Inclusive)**

22 75. Plaintiffs re-allege and incorporate herein by reference each and every allegation
 23 and statement contained in paragraphs 1-20.

24 76. Plaintiffs are informed and believe, and thereupon allege, that on September 6,
 25 2025, after the Subject Collision, AMR and DOES 1 through 100, inclusive, and each of them,
 26 negligently, carelessly, recklessly, and unlawfully treated WILBURN first and delayed and/or
 27 failed to timely evaluate and attend to Gavin and MADELINE.

28 77. AMR and DOES 1 through 100, inclusive, had a duty to use reasonable care to

1 prevent harm to MADELINE and Gavin while providing aid at the scene of the Subject Collision.

2 78. AMR and DOES 1 through 100, inclusive, breached their duty of care by delaying
3 and/or failing to timely evaluate and provide aid to MADELINE and Gavin. Despite the severe
4 and life-threatening injuries suffered by MADELINE and Gavin in the Subject Collision,
5 Defendants AMR and DOES 1 through 100, inclusive, attended to WILBURN first, and
6 transported him first, and delayed and/or failed to timely render aid to the more severely injured
7 victims, MADELINE and Gavin.

8 79. AMR and DOES 1 through 100, inclusive, decision to attend to and transport
9 WILBURN first and delay and/or failure to timely render aid to MADELINE and Gavin was a
10 substantial factor and the legal and proximate cause of the injuries, damages, and pain suffered by
11 MADELINE and Gavin as complained herein, including to cause further brain damage to
12 MADELINE and Gavin's injuries, damages, pain, and ultimately death.

13 80. As a direct, legal, and proximate result of the conduct of AMR and DOES 1
14 through 100, inclusive, and each of them, MADELINE suffered severe and permanent injuries,
15 and Gavin suffered injuries, damages, pain and ultimately death.

16 81. As a direct and foreseeable consequence of the above-described conduct,
17 MADELINE suffered catastrophic injuries, and Gavin suffered catastrophic injuries to his body,
18 ultimately causing his wrongful death. The above-described negligence of Defendants AMR and
19 DOES 1 through 100, inclusive, and each of them, was the direct and foreseeable cause of, and
20 substantial factor in causing, MADELINE's profound injuries, and Gavin's profound injuries,
21 resulting in Gavin's death and Plaintiffs' injuries and damages.

22 82. As a direct, legal, and proximate result of the conduct of AMR and DOES 1
23 through 100, inclusive, which caused Gavin's death, THE ESTATE OF GAVIN HINKLEY, by
24 and through Successors-in-Interest the HINKLEYS, is entitled to all survival damages accruing to
25 Gavin prior to his death, including pre-death pain and suffering under *Code of Civil Procedure* §
26 377.34, and all special damages available at law.

27 83. As a legal, direct and proximate result of the conduct of
28 AMR and DOES 1 through 100, inclusive, as aforesaid, Plaintiffs have incurred property and

1 medical expenses in an amount to be stated according to proof, pursuant to *Code of Civil*
 2 *Procedure* § 425.10.

3 84. As a legal, direct and proximate result of the conduct of AMR and DOES 1 through
 4 100, inclusive, Plaintiffs sustained non-economic damages, including, but not limited to, past and
 5 future physical pain and mental suffering, loss of enjoyment of life, disfigurement, physical
 6 impairment, inconvenience, grief, anxiety, humiliation, serious emotional distress, in an amount in
 7 excess of the jurisdictional minimum, according to proof, pursuant to *Code of Civil Procedure* §
 8 425.10.

9 85. As a legal, direct and proximate result of the grossly negligent conduct of
 10 AMR and DOES 1 through 100, inclusive, Plaintiffs were compelled to, and did, employ the
 11 services of hospitals, physicians, surgeons, nurses, and the like, to care for and treat them, the
 12 exact amount of such losses to be stated according to proof, pursuant to *Code of Civil Procedure* §
 13 425.10.

14 86. As a legal, direct and proximate result of the grossly negligent conduct of
 15 AMR and DOES 1 through 100, inclusive, as aforesaid, Plaintiffs suffered lost earning capacity,
 16 the exact amount of such losses to be stated according to proof, pursuant to *Code of Civil*
 17 *Procedure* § 425.10.

18 **SIXTH CAUSE OF ACTION**

19 **(Bad Faith/Gross Negligence In Emergency Dispatch – By Plaintiff MADELINE FOX and**
 20 **THE ESTATE OF GAVIN HINKLEY Against Defendants COUNTY OF RIVERSIDE,**
 21 **CITY OF BEAUMONT, CITY OF CALIMESA, and DOES 1 through 100, Inclusive)**

22 87. Plaintiffs re-allege and incorporate paragraphs 1-20 as though fully set forth
 23 herein.

24 88. Plaintiffs are informed and believe, and thereon allege, that on September 6, 2025,
 25 RIVERSIDE, BEAUMONT, CALIMESA, and DOES 1 through 100, inclusive, and each of them,
 26 owed a duty to all reasonably foreseeable people, including MADELINE and Gavin, to exercise
 27 reasonable care in the receipt, processing, and dispatch of emergency services.

28 89. Plaintiffs are informed and believe, and thereupon allege, that on September 6,

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2025, after the Subject Collision, RIVERSIDE, BEAUMONT, CALIMESA, and DOES 1 through 100, inclusive, and each of them, acted in bad faith and/or with gross negligence in the dispatch of emergency personnel to the scene of the Subject Collision. Despite the severe, life-threatening injuries suffered by MADELINE and Gavin in the Subject Collision, RIVERSIDE, BEAUMONT, CALIMESA, and DOES 1 through 100, inclusive, demonstrated an extreme departure from the standard of care by failing to properly categorize the severity of MADELINE and Gavin’s medical emergency, failing to follow established protocols, failing to prioritize medical aid to MADELINE and Gavin over WILBURN’s less severe injuries and other non-emergency matters, and unreasonably delaying the dispatch of advanced life support personnel. The conduct of these Defendants as described herein constituted a systemic and reckless disregard for the lives of MADELINE and Gavin.

90. RIVERSIDE, BEAUMONT, CALIMESA, and DOES 1 through 100, inclusive, failures as described herein delayed emergency medical aid to MADELINE and Gavin, and were a substantial factor and the legal and proximate cause of the injuries, damages, and pain suffered by MADELINE and Gavin as complained herein.

91. As a direct, legal, and proximate result of the conduct of RIVERSIDE, BEAUMONT, CALIMESA, and DOES 1 through 100, inclusive, and each of them, MADELINE suffered severe and permanent injuries, and Gavin suffered injuries, damages, pain, and ultimately death.

92. As a direct and foreseeable consequence of the above-described bad faith and gross negligence, MADELINE suffered catastrophic injuries, and Gavin suffered catastrophic injuries to his body, ultimately causing his wrongful death. The above-described bad-faith and gross negligence of RIVERSIDE, BEAUMONT, CALIMESA, and DOES 1 through 100, inclusive, and each of them, was the direct and foreseeable cause of, and substantial factor in causing, MADELINE’s profound injuries, and Gavin’s profound injuries, resulting in his death and Plaintiffs’ injuries and damages.

93. As a direct, legal, and proximate result of the bad faith and gross negligence of RIVERSIDE, BEAUMONT, CALIMESA, and DOES 1 through 100, inclusive, which caused

1 Gavin's death, THE ESTATE OF GAVIN HINKLEY, by and through Successors-in-Interest the
2 HINKLEYS, is entitled to all survival damages accruing to Gavin prior to his death, including pre-
3 death pain and suffering under *Code of Civil Procedure* § 377.34, and all special damages
4 available at law.

5 94. As a legal, direct and proximate result of the grossly negligent conduct of
6 RIVERSIDE, BEAUMONT, CALIMESA, and DOES 1 through 100, inclusive, as aforesaid,
7 Plaintiffs have incurred property and medical expenses in an amount to be stated according to
8 proof, pursuant to *Code of Civil Procedure* § 425.10.

9 95. As a legal, direct and proximate result of the bad-faith and grossly negligent
10 conduct of RIVERSIDE, BEAUMONT, CALIMESA, and DOES 1 through 100, inclusive,
11 Plaintiffs sustained non-economic damages, including, but not limited to, past and future physical
12 pain and mental suffering, loss of enjoyment of life, disfigurement, physical impairment,
13 inconvenience, grief, anxiety, humiliation, serious emotional distress, in an amount in excess of
14 the jurisdictional minimum, according to proof, pursuant to *Code of Civil Procedure* § 425.10.

15 96. As a legal, direct and proximate result of the bad-faith and grossly negligent
16 conduct of RIVERSIDE, BEAUMONT, CALIMESA, and DOES 1 through 100, inclusive,
17 Plaintiffs were compelled to, and did, employ the services of hospitals, physicians, surgeons,
18 nurses, and the like, to care for and treat them, the exact amount of such losses to be stated
19 according to proof, pursuant to *Code of Civil Procedure* § 425.10.

20 97. As a legal, direct and proximate result of the bad-faith and grossly negligent
21 conduct of RIVERSIDE, BEAUMONT, CALIMESA, and DOES 1 through 100, inclusive, as
22 aforesaid, Plaintiffs suffered lost earning capacity, the exact amount of such losses to be stated
23 according to proof, pursuant to *Code of Civil Procedure* § 425.10.

24 **SEVENTH CAUSE OF ACTION**

25 **(Wrongful Death — By Plaintiffs LAUREN HINKLEY and CORY HINKLEY, Individually,**
26 **Against All Defendants, and DOES 1 through 100, Inclusive)**

27 98. Plaintiffs re-allege and incorporate herein by reference each and every allegation
28 and statement contained in paragraphs 1-20.

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99. The HINKLEYS are the surviving parents of Gavin. Gavin died leaving no surviving spouse, domestic partner, or issue. Pursuant to *Code of Civil Procedure* § 377.60, the HINKLEYS have the absolute statutory right and standing to bring this action for the wrongful death of their son in their individual capacities.

100. As a direct, legal, and proximate result of the careless, negligent, grossly negligent, and unlawful conduct of all Defendants, and each of them, as described above, Gavin died.

101. As a direct and legal result of the wrongful death of Gavin, the HINKLEYS have been deprived of the love, companionship, comfort, care, assistance, protection, affection, society, and moral support of their son, and have sustained other economic and non-economic damages available under California wrongful death law, including loss of financial support, loss of gifts and benefits, and loss of household services in an amount to be determined according to proof at the time of trial.

102. The HINKLEYS have incurred funeral and burial expenses as a result of the death of their son in an amount according to proof at trial.

103. All of said damages combine to a sum in excess of the jurisdictional minimum of this Court, which will be stated according to proof, pursuant to *Code of Civil Procedure* § 425.10.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray judgment against all Defendants as follows:

For Plaintiff MADELINE FOX (Causes of Action 1-6):

1. For general non-economic damages for past and future physical pain, mental suffering, and disfigurement in an amount in excess of the jurisdictional minimum, according to proof;
2. For economic damages including hospital, medical, professional, and incidental expenses, according to proof;
3. For economic damages related to loss of earnings and lost earning capacity, according to proof;

For THE ESTATE OF GAVIN HINKLEY, by and through Successors-in-Interest

LAUREN HINKLEY and CORY HINKLEY (Causes of Action 1-6):

1. For all survival damages available to the ESTATE OF GAVIN HINKLEY under *Code of Civil Procedure* § 377.34, including pre-death injuries and pre-death pain and mental suffering, loss of enjoyment of life, disfigurement, physical impairment, inconvenience, grief, anxiety, humiliation, and serious emotional distress, according to proof;
2. For pre-death economic damages, including medical expenses and property damage, as well as lost earnings and lost earning capacity, according to proof;

For Plaintiffs LAUREN HINKLEY and CORY HINKLEY, Individually (Cause of Action 7):

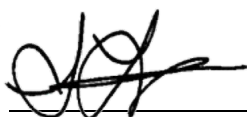
1. For all past and future wrongful death damages under CCP § 377.60, including the loss of Decedent’s love, companionship, comfort, care, assistance, protection, affection, society, moral support, financial support, gifts, benefits, and household services;
2. For funeral and burial expenses;

For All Plaintiffs:

1. For pre-trial interest, according to proof;
2. For prejudgment interest, according to proof;
3. For costs of suit incurred herein; and
4. For such other and further relief as this Court may deem just and proper.

DATED: April 30, 2026

PANISH | SHEA | RAVIPUDI LLP and
SHERNOFF BIDART ECHEVERRIA LLP

By: 

Spencer R. Lucas
Attorneys for Plaintiffs

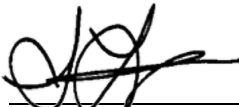
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DEMAND FOR JURY TRIAL

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

DATED: April 30, 2026

PANISH | SHEA | RAVIPUDI LLP and
SHERNOFF BIDART ECHEVERRIA LLP

By: 

Spencer R. Lucas
Attorneys for Plaintiffs