

SHORT TITLE:
Tapia v. Teslar Motors, Inc., et al.

CASE NUMBER:

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(This Attachment may be used with any Judicial Council form.) (Add pages as required)

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On or about August 12, 2014, at approximately 10:00 p.m., plaintiff Teodora Tapia also known as Teodora Rodriguez De Tapia, herein referred to as Plaintiff, was an employee of Flagship Facility Services, Inc., and was working on said date and time, as a janitor providing janitorial services on the premises of defendant Tesla Motors, Inc., located at 45500 Fremont Boulevard, Fremont, CA 94538.

Plaintiff was in the course of performing janitorial services when she was struck by a Tesla vehicle that was being operated/driven by Defendant, Doe 1, an employee of Defendant Tesla Motors, Inc., and/or Defendants Does 2 through 25, inclusive, and as the result, Plaintiff was pinned between the bumpers of said vehicle and another vehicle.

Defendant Doe 1, an employee of Defendant Tesla Motors, Inc., and/or Defendants Does 2 through 25, inclusive, continued to drive/operate said vehicle and struck Plaintiff a second time, pinning Plaintiff a second time, between the bumpers of the two vehicles.

As the result of Defendants' actions, Plaintiff suffered serious and permanent injuries to her lower extremities and body.

Defendants, and each of them, negligently owned, operated, controlled, maintained and inspected its premises, which caused physical and emotional injuries to Plaintiff.

Defendants, and each of them, knew or should have known, of said dangerous conditions on its premises, failed to warn Plaintiff of the dangerous conditions, failed to make safe, and failed to employ sufficient personnel to operate, manage, maintain, inspect and clean its premises.

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)