

MICHAEL K. JEANES
Clerk of the Superior Court
By Melissa Tadeo, Deputy
Date 04/04/2013 Time 14:15:54

Description	Amount
CASE# CV2013-092799	
CIVIL NEW COMPLAINT	309.00
TOTAL AMOUNT	309.00

Receipt# 22885250

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IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF MARICOPA

7 BARBARA STIDHUM,)
 8 Plaintiff,)
 9 vs.)
 10 LAUREN ASHLEY HOPKINS, a Minor, by)
 and through her next friend, SUSAN)
 11 HOPKINS, LAUREN ASHLEY HOPKINS,)
 individually, SUSAN HOPKINS and)
 12 THOMAS HOPKINS, husband and wife;)
 13 DOES I-XX and BLACK & WHITE)
 CORPORATIONS I-V,)
 14 Defendants.)

No. **CV2013-092799**
COMPLAINT
 Tort/Motor Vehicle

15 Plaintiff alleges as follows:

16 **I.**

17 The events giving rise to the cause of action set forth herein occurred within the County of
 18 Maricopa, State of Arizona, that this Court has jurisdiction over the subject matter and the parties
 19 to this litigation.

20 **II.**

21 That Defendant, LAUREN ASHLEY HOPKINS, upon information and belief, at all times
 22 relevant hereto, was a minor.

23 **III.**

24 That Defendants, SUSAN HOPKINS and THOMAS HOPKINS, upon information and
 25 belief, was at all times relevant hereto married and was acting on behalf of and for the benefit of said
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Defendants' marital community.

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IV.

That Defendants, SUSAN HOPKINS and THOMAS HOPKINS, upon information and belief, are the parents of the minor, LAUREN ASHLEY HOPKINS, and thus are responsible for her actions.

V.

The "Doe" Defendants I-XX are each fictitious names to designate unknown parties who may have in some manner contributed to Plaintiff's injuries and damages and are liable therefore. The true names for said Defendants are unknown to the Plaintiff at this time and leave of Court is sought to amend this Complaint to include their true names after they are discovered.

VI.

The "BLACK & WHITE CORPORATIONS" Defendants I-V are each fictitious names to designate unknown companies and/or corporations and/or partnerships who may have in some manner contributed to Plaintiff's injuries and damages and are liable therefore. The true names for said Defendants are unknown to the Plaintiff at this time and leave of Court is sought to amend this Complaint to include their true names after they are discovered.

VII.

That on or about May 29, 2012 at or near south Priest Drive and West Grove Parkway in Tempe, Arizona, Defendant, LAUREN ASHLEY HOPKINS, operated and/or maintained a vehicle in a negligent manner and with reckless disregard of the rights and feelings of the Plaintiff, thereby causing damage to the Plaintiff.

VIII.

Defendants, SUSAN HOPKINS and THOMAS HOPKINS, negligently entrusted a vehicle to their minor child.

IX.

Upon information and belief, Defendants SUSAN HOPKINS and THOMAS HOPKINS,

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1 provided the vehicle involved in the subject collision for general use by members of the family
2 including Defendant LAUREN ASHLEY HOPKINS. Therefore, Defendants SUSAN HOPKINS and
3 THOMAS HOPKINS are vicariously liable for any harm that is caused by or related to the use of
4 the vehicle under the Family Purpose Doctrine.

5 **X.**

6 That as a result of Defendants' conduct as stated above, Plaintiff, BARBARA STIDHUM,
7 sustained permanent personal injuries, which have caused pain, suffering and inconvenience; has
8 incurred expenses for medical care which will continue; and has suffered a loss of earnings, which
9 will continue. Plaintiff asks leave to amend as necessary to conform to the proof regarding the exact
10 amount of said past and future losses.

11 **XI.**

12 Damages herein exceed the minimum jurisdictional limits of the Court.

13 **XII.**

14 That Defendant, LAUREN ASHLEY HOPKINS, may now be an adult and therefore subject
15 to suit individually.

16 **WHEREFORE**, Plaintiff, BARBARA STIDHUM, prays for judgment against the
17 Defendants, as follows:

- 18 1. For such sums as and for general damages as may be fair and just.
- 19 2. For those special damages incurred to date, plus those future special damages proved at
20 the time of trial.
- 21 3. For costs of suit herein; and,
- 22 4. For such other and further relief as the Court deems just and proper.

23 DATED this 3rd day of March, 2013.

24 **WATTEL & YORK**

25 Michael L. York
26 Brian M. Torba
Attorneys for Plaintiff