

Electronically FILED by Superior Court of California, County of Riverside on 03/22/2024 12:55 PM  
Case Number CVRI2401530 0000087761153 - Jason B. Galkin, Executive Officer/Clerk of the Court By Joseline DeRosier, Clerk

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Attorneys for Plaintiff  
RANSOME NDI NFOR

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**FOR THE COUNTY OF RIVERSIDE**  
**UNLIMITED JURISDICTION**

RANSOME NDI NFOR,

Plaintiff,

vs.

CITY OF PERRIS; COUNTY OF RIVERSIDE;  
STATE OF CALIFORNIA; MICHAEL  
ANTHONY ARREOLA; and DOES 1-100,  
inclusive,

Defendants.

Case No.: **CVRI 2401530**

**PLAINTIFF'S COMPLAINT FOR  
DAMAGES**

- 1. NEGLIGENCE**
- 2. VIOLATION OF TITLE 42 § 1983**

**DEMAND FOR JURY TRIAL**

1 COMES NOW Plaintiff RANSOME NDI NFOR (hereinafter “PLAINTIFF”), for Causes of  
2 Action against Defendants CITY OF PERRIS (hereinafter “DEFENDANT CITY”); COUNTY OF  
3 RIVERSIDE (hereinafter “DEFENDANT COUNTY”); STATE OF CALIFORNIA (hereinafter  
4 “DEFENDANT STATE”); MICHAEL ANTHONY ARREOLA (hereinafter “DEFENDANT  
5 ARREOLA”); and DOES 1-100, inclusive (collectively hereinafter “DEFENDANTS”); and each of  
6 them, complains and alleges as follows:

7 **GENERAL ALLEGATIONS**

8  
9 1. The claims set forth herein arise from a motor vehicle collision that occurred on  
10 December 8, 2023, in or around the City of Perris, County of Riverside, California (hereinafter  
11 “SUBJECT INCIDENT”), which caused severe personal injuries to PLAINTIFF.

12 2. PLAINTIFF is informed, believes, and thereon alleges, DEFENDANT ARREOLA  
13 was, and is, a resident of the County of Riverside, California.

14 3. DEFENDANTS PERRIS, COUNTY, STATE, and each of them, at all times herein  
15 relevant, are a public entity duly organized and existing under and by virtue of laws of the State of  
16 California and authorized to do and are doing business in the State of California.

17 4. PLAINTIFF’S injuries occurred on Redlands Avenue, south of San Jacinto Avenue,  
18 in or around the City of Perris (“SUBJECT LOCATION”), which falls within the Riverside County  
19 Judicial District, and this Court is therefore the proper Court in which to bring this action, pursuant  
20 to *Code of Civil Procedure* sections 395 and 396.

21 5. DEFENDANTS PERRIS, COUNTY, STATE, and each of them, at all times herein  
22 relevant, are a public entity duly organized and existing under and by virtue of laws of the State of  
23 California and authorized to do and are doing business in the State of California.

24 6. On or about January 12, 2024, prior to the filing of this Complaint, and pursuant to the  
25 provisions of Government Code section 910, et seq., PLAINTIFF timely, properly, and duly  
26 submitted to DEFENDANT CITY, a claim form for the injuries and damages set forth herein on  
27 account of the events described herein. Attached hereto as “**Exhibit 1**” is a true and correct copy of  
28 PLAINTIFF’S claim form. On or about January 29, 2024, PLAINTIFF received correspondence from



1 DEFENDANT CITY, by and through PERMA. PERMA stated that PLAINTIFF's claim was  
2 rejected. Attached hereto as "**Exhibit 2**" is a true and correct copy of DEFENDANT CITY'S rejection  
3 letter.

4 7. On or about January 12, 2024, prior to the filing of this Complaint, and pursuant to the  
5 provisions of Government Code section 910, et seq., PLAINTIFF timely, properly, and duly  
6 submitted to DEFENDANT COUNTY, a claim form for the injuries and damages set forth herein on  
7 account of the events described herein. Attached hereto as "**Exhibit 3**" is a true and correct copy of  
8 PLAINTIFF'S claim form. On or about January 30, 2024, PLAINTIFF received correspondence from  
9 DEFENDANT COUNTY rejecting PLAINTIFF'S claim. Attached hereto as "**Exhibit 4**" is a true  
10 and correct copy of DEFENDANT COUNTY'S rejection letter.

11 8. On or about January 12, 2024, prior to the filing of this Complaint, and pursuant to the  
12 provisions of Government Code section 910, et seq., PLAINTIFF timely, properly, and duly  
13 submitted to DEFENDANT STATE, a claim form for the injuries and damages set forth herein on  
14 account of the events described herein. Attached hereto as "**Exhibit 5**" is a true and correct copy of  
15 PLAINTIFF'S claim form. To date, PLAINTIFF has not received a response from DEFENDANT  
16 STATE in regard to PLAINTIFF'S claim form.

17 9. PLAINTIFF is informed, believe, and thereon allege, that DEFENDANTS CITY,  
18 COUNTY, STATE and DOES 1-100 have a statutory duty and are statutorily liable for injury caused  
19 by their act or omission to the same extent as a private person would be, as provided by Government  
20 Code Section 820(a).

21 10. The true names and capacities, whether individual, plural, corporate, partnership,  
22 associate, or otherwise, of DOES 1-100, inclusive, are unknown to PLAINTIFF, who therefore sue  
23 said DEFENDANTS by such fictitious names. The full extent of the facts linking such fictitiously  
24 sued DEFENDANTS are unknown to PLAINTIFF. PLAINTIFF is informed, believes, and thereon  
25 alleges that each of the DEFENDANTS designated herein as a DOE was, and is, negligent, or in some  
26 other actionable manner, responsible for the events and happenings hereinafter referred to, and  
27 thereby negligently, or in some other actionable manner, legally and proximately caused the described  
28 injuries and damages to PLAINTIFF. PLAINTIFF will seek leave of the Court to amend this

1 Complaint to show the DEFENDANTS' true names and capacities after the same have been  
2 ascertained.

3 11. PLAINTIFF is informed, believes, and thereon alleges that at all times relevant and  
4 mentioned herein, DEFENDANTS, and each of them, were the agents, servants, employees, and/or  
5 successors in interest, and/or joint venturers of their co-defendants, and each of them was acting  
6 within the course, scope, and authority of said agency, employment, and/or venture, and that each  
7 and every defendant, as aforesaid, when acting as a principal, was negligent in the selection and  
8 hiring, retention, training and supervision of each and every other defendant as an agent, employee  
9 and/or joint venturer. Further, that each said defendant, while acting as a principal, expressly directed,  
10 consented to, approved, affirmed, and ratified each and every action taken by their co-defendants, as  
11 alleged. PLAINTIFF is informed, believes, and thereon alleges that said fictitiously named  
12 DEFENDANTS, and each of them, engaged in the same or similar conduct as DEFENDANTS,  
13 thereby proximately causing PLAINTIFF'S injuries and damages as set forth herein, either through  
14 the said fictitious DEFENDANTS' own negligent conduct or through the conduct of agents, servants,  
15 or employees, or due to their pursuit of the vehicle operated by DEFENDANT ARREOLA.

16 12. PLAINTIFF is informed and believes, and thereon alleges, that pursuant to California  
17 Government Code §§ 815.2, 815.4, and 820(a), DEFENDANTS and DOES 1-100, inclusive are  
18 vicariously liable for the action and omissions of their employees, agents, or independent contractors.

19 13. On December 8, 2023, the date of the SUBJECT INCIDENT, police officer(s) were  
20 operating police cruisers in pursuit of DEFENDANT ARREOLA, who was the operator of a 2007  
21 Acura TL ("SUBJECT VEHICLE"), traveling northbound on Redlands Avenue. PLAINTIFF is  
22 informed, believes, and thereon alleges, at all times relevant and mentioned herein, that the police  
23 cruisers and SUBJECT VEHICLE were owned, operated, managed, maintained, inspected, and/or  
24 otherwise controlled by DEFENDANTS and DOES 1-100.

25 14. On December 8, 2023, PLAINTIFF was operating a 2012 Hyundai Elantra (hereinafter  
26 "PLAINTIFF'S VEHICLE"), traveling southbound on Redlands Avenue. At the same time and  
27 location, the police officers and DEFENDANT ARREOLA were operating their vehicles without due  
28 care, causing DEFENDANT ARREOLA to collide with PLAINTIFF'S VEHICLE.





1           20. PLAINTIFF is informed, believes, and thereon alleges, at all times relevant and  
2 mentioned herein, DEFENDANTS, and each of them, carelessly and negligently owned, leased,  
3 managed, maintained, and/or entrusted the SUBJECT VEHICLE to DEFENDANT ARREOLA, who  
4 carelessly and negligently operated, drove, and/or controlled the SUBJECT VEHICLE, so as to  
5 legally, directly, and proximately cause the SUBJECT INCIDENT.

6           21. PLAINTIFF is informed, believes, and thereon alleges, DEFENDANTS, and each of  
7 them, breached their duty to own, lease, manage, maintain, entrust, control, and/or operate the  
8 SUBJECT VEHICLE in a reasonable manner, thereby causing bodily injuries to PLAINTIFF.

9           22. PLAINTIFF is informed, believes, and thereon alleges, DEFENDANTS were agents,  
10 servants, employees, successors in interest, and/or joint venturers of their co-defendants, and were,  
11 as such, acting within the course, scope, and authority of said agency, employment and/or venture,  
12 and that each and every defendant, as aforesaid, when acting as a principal, was negligent in the  
13 selection of each and every other defendant as an agent, servant, employee, successor in interest,  
14 and/or joint venturer.

15           23. PLAINTIFF is informed, believes, and thereon alleges, at all times mentioned herein,  
16 DEFENDANTS, carelessly and negligently, owned, leased, managed, maintained, controlled,  
17 entrusted and/or operated the SUBJECT VEHICLE so as to legally and proximately cause the same  
18 to collide with PLAINTIFF'S VEHICLE.

19           24. More specifically, PLAINTIFF is informed, believes, and thereon alleges, at all times  
20 relevant and mentioned herein, DEFENDANT ARREOLA carelessly and negligently operated,  
21 drove, and/or controlled the SUBJECT VEHICLE, owned and operated by DEFENDANTS, thereby  
22 colliding with PLAINTIFF'S VEHICLE.

23           25. PLAINTIFF is informed, believes, and thereon alleges, at all times relevant and  
24 mentioned herein, said careless and negligent conduct of DEFENDANTS, and each of them, in regard  
25 to the ownership, leasing, management, maintenance, entrustment, operation, driving, and/or control  
26 of the SUBJECT VEHICLE was the direct, legal and proximate cause of the injuries and damages to  
27 PLAINTIFF as herein alleged.

28           26. As a legal, direct, and proximate result of the aforementioned conduct of the



1 DEFENDANTS, and each of them, PLAINTIFF was injured and hurt in his health, strength and/or  
2 activity, sustaining serious injuries to his body, and/or shock and injury to his nervous system and  
3 person, all of which said injuries have caused and continue to cause PLAINTIFF great physical and/or  
4 mental pain and suffering. PLAINTIFF is further informed, believes, and thereon alleges that said  
5 injuries will result in some permanent disability to him, all to his general damage in an amount which  
6 will be stated according to proof, pursuant to California *Code of Civil Procedure* Section 425.10.

7 27. As a legal, direct, and proximate result of the aforementioned conduct of  
8 DEFENDANTS, and each of them, PLAINTIFF sustained damage to his property in an amount which  
9 will be stated according to proof, pursuant to California *Code of Civil Procedure* Section 425.10.

10 28. As a legal, direct and proximate result of the aforementioned conduct of  
11 DEFENDANTS, and each of them, PLAINTIFF was prevented from attending his usual occupation  
12 and/or PLAINTIFF is informed and believes, and thereon alleges, that he will be prevented from ever  
13 attending to his occupation in the future, and thereby will also sustain a loss of earning capacity and  
14 loss of opportunity, in addition to lost earnings, past, present, and future according to proof, pursuant  
15 to California *Code of Civil Procedure* Section 425.10.

16 29. As a legal, direct, and proximate result of the conduct of the DEFENDANTS, and each  
17 of them, PLAINTIFF was compelled to and did employ the services of hospitals, physicians,  
18 surgeons, nurses and the like, to care for and treat their injuries, and did incur hospital, medical,  
19 professional and incidental expenses, and PLAINTIFF is informed and believes, and thereon alleges,  
20 that by reason of his injuries, he will necessarily incur additional like expenses for an indefinite period  
21 of time in the future, the exact amount of which expenses will be stated according to proof, pursuant  
22 to California *Code of Civil Procedure* Section 425.10.

23 **SECOND CAUSE OF ACTION**

24 **VIOLATION OF TITLE 42 § 1983**

25 (By PLAINTIFF against DEFENDANTS CITY, COUNTY, STATE and DOES 1-100)

26 30. PLAINTIFF re-alleges and incorporates herein by reference each and every allegation  
27 and statement contained in the prior paragraphs.

28 31. At all times mentioned herein DEFENDANTS, DOES 1 through 100, and each of

1 them were under a duty not to deprive PLAINTIFF of his rights as afforded to him under the United  
2 States Constitution and California Constitution, including but not limited to, bodily harm.

3 32. DEFENDANTS DOES 1 through 100, and each of them deprived PLAINTIFF of his  
4 rights there under by engaging in conduct, as set forth in the prior paragraphs, which resulted in  
5 PLAINTIFF'S injuries and damages.

6 33. While engaged in the aforementioned conduct, DEFENDANTS, DOES 1 through 100,  
7 and each of them were acting under the color of law of a statute, ordinance, regulation, custom, or  
8 practice that regulates or governs DEFENDANTS and their employees.

9 34. As employers and supervisors, DEFENDANTS owed PLAINTIFF a duty to manage,  
10 supervise, review, investigate and monitor their police officers conduct and behavior as so to prevent  
11 their police officers from harming public citizens while acting under the color of law or in the course  
12 and scope of their duties for DEFENDANTS.

13 35. DEFENDANTS breached their duty of care owed to PLAINTIFF by failing to  
14 manage, supervise, review, investigate and monitor their police officers' field conduct, behavior,  
15 activities, and psychological profiles. DEFENDANTS failings were in direct violation of  
16 PLAINTIFF'S substantive rights under the United States Constitution.

17 36. DEFENDANTS' breach resulted in a direct violation of PLAINTIFF'S constitutional  
18 rights to be free from fear of bodily harm, assault, and mental and emotional distress.

19 37. DEFENDANTS' failings amounted to a deliberate indifference to PLAINTIFF'S  
20 Constitutional rights because DEFENDANTS had actual or constructive notice that its failures were  
21 substantially certain to result in a violation of PLAINTIFF'S constitutional rights, but it consciously  
22 and deliberately chooses to disregard the substantial risk of harm.

23 38. PLAINTIFF is informed and believes, and on such information and belief allege that  
24 DEFENDANTS' failure to manage, supervise, review, investigate and monitor their police officers'  
25 field conduct, behavior, activities and psychological profiles were not limited to the police officer's  
26 violations of PLAINTIFF'S constitutional rights. Rather, PLAINTIFF is informed and believes, and  
27 on such information and belief alleges that DEFENDANTS had a long-standing custom or practice  
28 of consistently and repeatedly failing to manage, supervise, review, investigate and monitor their



1 police officers field conduct, behavior, activities and psychological profiles with public citizens.

2 39. PLAINTIFF is informed and believes, and thereon alleges, DEFENDANTS and  
3 DOES 1 through 100, inclusive, engaged in said conduct with a conscious disregard of the dangers  
4 such conduct would and did create for the rights and safety of PLAINTIFF. PLAINTIFF is further  
5 informed and believes, and thereon alleges that said police officer who was employed, managed,  
6 supervised, trained, retained, and contracted by DEFENDANTS, acted with malice in that they  
7 engaged in despicable conduct and in conscious disregard of the rights, safety, and welfare of  
8 PLAINTIFF. Said conduct of the police officer was oppressive, despicable, highly reprehensible, and  
9 done in the conscious disregard for the rights and safety of DECE, and as such, warrants imposition  
10 of punitive damages against DEFENDANTS.

11 40. As a legal, direct, and proximate result of the aforementioned conduct of the  
12 DEFENDANTS, and each of them, PLAINTIFF was injured and hurt in his health, strength and/or  
13 activity, sustaining serious injuries to his body, and/or shock and injury to his nervous system and  
14 person, all of which said injuries have caused and continue to cause PLAINTIFF great physical and/or  
15 mental pain and suffering. PLAINTIFF is further informed, believes, and thereon alleges that said  
16 injuries will result in some permanent disability to him, all to his general damage in an amount which  
17 will be stated according to proof, pursuant to California *Code of Civil Procedure* Section 425.10.

18 41. As a legal, direct, and proximate result of the aforementioned conduct of  
19 DEFENDANTS, and each of them, PLAINTIFF sustained damage to his property in an amount which  
20 will be stated according to proof, pursuant to California *Code of Civil Procedure* Section 425.10.

21 42. As a legal, direct and proximate result of the aforementioned conduct of  
22 DEFENDANTS, and each of them, PLAINTIFF was prevented from attending his usual occupation  
23 and/or PLAINTIFF is informed and believes, and thereon alleges, that he will be prevented from ever  
24 attending to his occupation in the future, and thereby will also sustain a loss of earning capacity and  
25 loss of opportunity, in addition to lost earnings, past, present, and future according to proof, pursuant  
26 to California *Code of Civil Procedure* Section 425.10.

27 43. As a legal, direct, and proximate result of the conduct of the DEFENDANTS, and each  
28 of them, PLAINTIFF was compelled to and did employ the services of hospitals, physicians,

1 surgeons, nurses and the like, to care for and treat their injuries, and did incur hospital, medical,  
2 professional and incidental expenses, and PLAINTIFF is informed and believes, and thereon alleges,  
3 that by reason of his injuries, he will necessarily incur additional like expenses for an indefinite period  
4 of time in the future, the exact amount of which expenses will be stated according to proof, pursuant  
5 to California *Code of Civil Procedure* Section 425.10.

6 **PRAYER FOR DAMAGES**

7 WHEREFORE, PLAINTIFFS, hereby pray for judgment against DEFENDANTS and DOES  
8 1-100, inclusive; and each of them, as follows:

9 1. For general damages (also known as non-economic damages), including but not  
10 limited to, past and future physical, mental, and emotional pain and suffering in an amount in excess  
11 of the jurisdictional minimum, according to proof;

12 2. For special damages (also known as economic damages), including but not limited to,  
13 past and future hospital, medical, professional, and incidental expenses as well as past and future loss  
14 of earnings, loss of opportunity, and loss of earning capacity, in excess of the jurisdictional minimum,  
15 according to proof;

16 3. For prejudgment interest, according to proof;

17 4. For cost of suit incurred herein, including attorney's fees, according to proof;

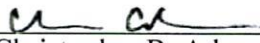
18 5. For damages for PLAINTIFF'S other losses, according to proof;

19 6. Punitive damages; and

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

21 Dated: March 22, 2024

22 Respectfully submitted,  
ADAMSON AHDOOT LLP

23  
24 By:   
25 Christopher B. Adamson, Esq.  
Attorneys for Plaintiff  
RANSOME NDI NFOR

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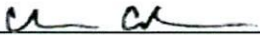
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**DEMAND FOR TRIAL BY JURY**

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

Dated: March 22, 2024

Respectfully submitted,  
ADAMSON AHDOOT LLP

By:   
Christopher B. Adamson, Esq.  
Attorneys for Plaintiff  
RANSOME NDI NFOR

# **EXHIBIT 1**



Personally Deliver or Mail to the:  
City Clerk or Secretary for the  
City of Perris  
101 North "D" Street  
Perris, CA 92570

RESERVE FOR FILING STAMP

**CLAIM FOR MONEY OR  
DAMAGES AGAINST  
THE CITY OF PERRIS**

**Note:** A claim relating to a cause of action for death or for injury to person or to personal property or growing crops shall be presented not later than six months after the accrual of the cause of action. A claim relating to any other cause of action shall be presented not later than one year after the accrual of the cause of action. See California Government Code §911.2.

**If additional space is needed to provide your information, please attach separate sheets which identify the paragraph(s) being answered. Sign, date and number all attachments to the claim form.**

1. Name and Post Office address of the Claimant:

Name of Claimant: RANSOME NDI NFOR

Post Office Address: 1150 S ROBERTSON BLVD  
LOS ANGELES CA 90035

Telephone: (310)888-0024

Email address: ELIJAH@AA.LAW / CHRISTOPHER@AA.LAW

2. Post Office address to which the person presenting the claim desires notices to be sent:

Name of Addressee: CHRISTOPHER B. ADAMSON, ESQ. Relationship to Claimant: ATTORNEY

Post Office Address: 1150 S ROBERTSON BLVD  
LOS ANGELES CA 90035

Telephone: (310)888-0024

Email: ELIJAH@AA.LAW / CHRISTOPHER@AA.LAW

3. Claimant date of birth, Social Security Number and gender:

Date of Birth: 09/03/1994

Social Security Number: N/A

Gender: M

Medicare/Medi-Cal Recipient YES

NO

**Section 111 of the Medicare, Medicaid, and SCHIP Extension Act of 2007 (MMSEA) (P.L. 110-173), adds mandatory reporting requirements for liability insurance (including self-insurance) and public entities. See 42 U.S.C. 1395y(b)(8). The City is requesting this information to comply with the requirements of MMSEA and will not disseminate this information, except for reporting purposes as required by the Act referenced above. You understand that if you are a Medicare beneficiary and you do not provide the requested information, you may be violating obligations as a beneficiary to assist the Centers for Medicare & Medicaid Services in coordinating benefits to pay your claims correctly and promptly.**

4. The date, place and other circumstances of the occurrence or transaction which gave rise to the claim asserted.

Date of Occurrence: 12/08/2023

Time of Occurrence: 9:45PM

Location: REDLANDS AVE / E SAN JACINTO AVE - PERRIS, CA

Circumstances giving rise to this claim: CLAIMANT WAS HEADED HOME AFTER PRACTICING SPORTS WITH FRIENDS. HE WAS TRAVELING EASTBOUND ON E SAN JACINTO AVE MAKING A RIGHT TURN ONTO SOUTHBOUND REDLANDS



AVE WHEN HE NOTICED A HIGH SPEED PURSUIT SPEEDING UP NORTHBOUND REDLANDS AVE. BEFORE CLAIMANT COULD MAKE ATTEMPTS TO AVOID A COLLISION, THE EVADING PARTY COLLIDED INTO CLAIMANT'S VEHICLE.

5. General description of the indebtedness, obligation, injury, damage or loss incurred so far as it may be known at the time of the presentation of the claim.  
CLAIMANT WAS A VICTIM OF NEGLIGENCE ON BEHALF OF THE CITY OF PERRIS, THE COUNTY OF RIVERSIDE, THE STATE OF CALIFORNIA, THE RIVERSIDE COUNTY SHERIFF DEPARTMENT, AND DEPUTY LABACO #5797 DUE TO THE PRIMARY CRASH FACTOR BEING A HIGH SPEED PURSUIT.

6. The name or names of the public employee or employees causing the injury, damage, or loss, if known.  
CITY OF PERRIS, COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, RIVERSIDE COUNTY SHERIFF DEPARTMENT, AND DEPUTY LABACO #5797

7. **If amount claimed totals less than \$10,000:** If the amount claimed totals less than ten thousand dollars (\$10,000) as of the date of presentation of the claim, including the estimated amount of any prospective injury, damage, or loss, insofar as it may be known at the time of the presentation of the claim, together with the basis of computation of the amount claimed.

Amount Claimed and basis for computation: TBD

8. **If amount claimed exceeds \$10,000:** If the amount claimed exceeds ten thousand dollars (\$10,000), no dollar amount shall be included in the claim. However, it shall indicate whether the claim would be a limited civil case. A limited civil case is one where the recovery sought, exclusive of attorney fees, interest and court costs, does not exceed \$25,000. An unlimited civil case is one in which the recovery sought is more than \$25,000. See California Code of Civil Procedure §86.

Limited Civil Case

Unlimited Civil Case

9. Name, address and telephone number of any witness(es) to the occurrence or transaction which gave rise to the claim asserted:

JUDE NJOFANG

(240)551-6295

28333 SOCORRO ST UNIT 49, MURRIETA, CA 92563

10. If the claim involves medical treatment for a claimed injury, please provide the name, address and telephone number of any doctor(s) or hospital(s) providing treatment:

AMR AMBULANCE - (951)782-5200 - 879 MARLBOROUGH AVE, RIVERSIDE, CA 92507

RIVERSIDE UNIVERSITY HEALTH SYSTEM - (951)486-5650 - 26520 CACTUS AVE, MORENO VALLEY, CA 92555

ANIL DATE MD - (661)803-7849 - 27141 HIDAWAY AVE STE 106, CANYON COUNTRY, CA 91351

ALL STAR PHYSICAL THERAPY - (951)723-8100 - 30141 ANTELOPE RD STE A, MENIFEE, CA 92584

TEMECULA ADVANCED IMAGING - (951)244-6700 - 29798 HAUN RD STE 103, MENIFEE, CA 92586

**If applicable, please attach any medical records or reports, medical bills or similar documents supporting your claim.**



11. If the claim relates to an automobile accident:

Claimant(s) Auto Ins. Co.: PROGRESSIVE	Telephone: (800)776-4737
Address: P.O. BOX 94670	
CLEVELAND, OH 44101	Insurance Policy No.: 952711624
Insurance Broker/Agent:	Telephone:
Address:	
Claimant's Veh. Lic. No.: 8FQM714	Vehicle Make/Year: HYUNDAI 2012
Claimant's Drivers Lic. No.: Y4818885	Expiration: 08/02/2024

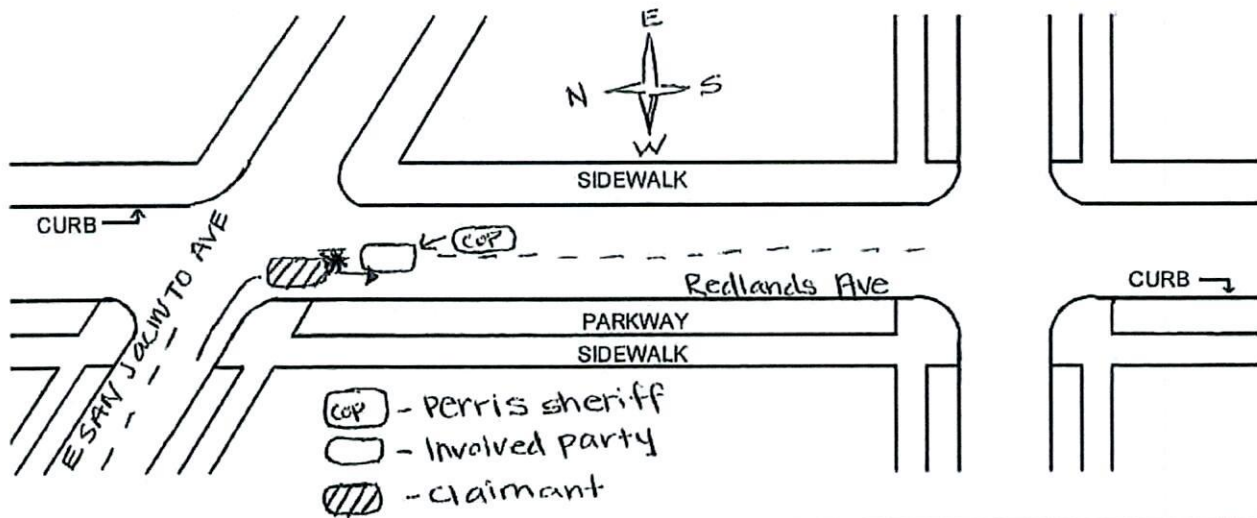
*If applicable, please attach any repair bills, estimates or similar documents supporting your claim.*

**READ CAREFULLY**

For all accident claims, place on following diagram name of streets, including North, East, South, and West; indicate place of accident by "X" and by showing house numbers or distances to street corners. If City/Agency Vehicle was involved, designate by letter "A" location of City/Agency Vehicle when you first saw it, and by "B" location of yourself or your vehicle when you first saw City/Agency Vehicle; location of

City/Agency vehicle at time of accident by "A-1" and location of yourself or your vehicle at the time of the accident by "B-1" and the point of impact by "X."

**NOTE:** If diagrams below do not fit the situation, attach hereto a proper diagram signed and by claimant.



**Warning:** Presentation of a false claim is a felony. See California Penal Code §72. In the event a legal action is filed and it is determined that the the action was not filed in good faith and with reasonable cause, the City/Agency may seek to recover all costs of defense. See California Code of Civil Procedure §1038.

CHRISTOPHER B. ADAMSON, ESQ.  
 C/O RANSOME NDI NFOR
 

 1-12-24
 

 Date

## **EXHIBIT 2**





**REJECTION OF CLAIM**

January 29, 2024

Ransom Ndi Nfor  
c/o Christopher B. Adamson, Esq.  
1150 S Robertson Blvd  
Los Angeles, CA 90035

Reference:	Principal:	City of Perris
	Loss Date:	12/08/2023
	Claim(s) Made:	1/16/2024
	Claimant(s):	Ndi Nfor, Ransom
	Our File Number:	24-176834

Dear Mr. Ndi Nfor:

We are the Third-Party Administrator handling the liability claims for the City of Perris.

Notice is hereby given that the claim, which you presented to the City of Perris on 1/16/2024, was rejected 1/29/2024. As part of this rejection notice, Government Code Section 913 requires that the City of Perris provide you with the following notice:

**WARNING**

Subject to certain exceptions, you have only six (6) months from the date this notice was personally delivered or deposited in the mail to file an action under California law on this claim. See Government Code Section 945.6. You may seek the advice of an attorney of your choice in connection with this matter. If you desire to consult an attorney, you should do so immediately.

Should you have any questions or wish to discuss this matter, please do not hesitate to contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael Fredrics', with a long horizontal flourish extending to the right.

Michael Fredrics  
Liability Administrator  
(909)396-5824  
mfredrics@adaminsure.com

cc: City of Perris



**PROOF OF SERVICE**

STATE OF CALIFORNIA            }  
COUNTY OF SAN BERNARDINO }

I am over the age of 18 years and not a party to the within action. My business address is 3380 Shelby Street.

On January 29, 2024, I served the documents entitled *REJECTION OF CLAIM* by placing a true copy thereof, enclosed in a sealed envelope, via U.S. Mail, addressed as follows:

Ransom Ndi Nfor  
c/o Christopher B. Adamson, Esq.  
1150 S Robertson Blvd  
Los Angeles, CA 90035

- {BY MAIL} As follows: I am "readily familiar" with the business practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Ontario, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.
- {BY PERSONAL SERVICE} I caused such envelope to be delivered by hand to the offices of the addressee.
- {BY FACSIMILE MACHINE} I caused the above-referenced document to be transmitted via facsimile machine on January 29, 2024 to the interested parties at the facsimile number noted above.
- {STATE} I certify (or declare) under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on January 29, 2024

  
\_\_\_\_\_  
Signature  
*Andrew Acevedo*  
\_\_\_\_\_  
Andrew Acevedo



# **EXHIBIT 3**

**COUNTY OF RIVERSIDE CLAIM FOR DAMAGES TO PERSON OR PROPERTY**



**INSTRUCTIONS:**

1. Read claim *thoroughly*.
2. Fill out claim as indicated; attach additional information if necessary.
3. This office needs the original completed claim form and clear readable copies of attachments (if any) if originals are not available.
4. This claim form *must* be signed.

OFFICE USE ONLY

**DELIVER OR U.S. MAIL TO:** CLERK OF THE BOARD OF SUPERVISORS  
 ATTN: CLAIMS DIVISION  
 P.O. BOX 1147, 4080 LEMON ST, 1<sup>ST</sup> FL.  
 RIVERSIDE, CA. 92502-1147 (951) 955-1060

TIME STAMP HERE

1. FULL NAME OF CLAIMANT <b>RANSOME NDI NFOR</b>		8. WHY DO YOU CLAIM THE COUNTY IS RESPONSIBLE? <b>NEGLIGENCE DUE TO HIGH SPEED</b>	
2. MAILING ADDRESS (STREET / PO BOX) <b>1150 S ROBERTSON BLVD</b>		<b>CRIMINAL POLICE PURSUIT</b>	
CITY <b>LOS ANGELES</b>	STATE <b>CA</b>		
HOME TELEPHONE <b>(310) 888-0024</b>	BUSINESS TELEPHONE ( )	9. NAMES OF ANY COUNTY EMPLOYEES (AND THEIR DEPARTMENTS) INVOLVED IN INJURY OR DAMAGE (IF APPLICABLE) CITY OF PERRIS, COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, RIVERSIDE COUNTY SHERIFF	
3. WHEN DID DAMAGE OR INJURY OCCUR (PLEASE BE EXACT) <b>12/08/2023 @ 9:45PM APPROXIMATELY</b>		NAME: <b>DEPUTY LABACO #5797</b>	DEPARTMENT: <b>RIVERSIDE COUNTY SHERIFF</b>
4. WHERE DID DAMAGE OR INJURY OCCUR? <b>REDLANDS AVE / E SAN JACINTO AVE</b>		10. WITNESSES TO DAMAGE OR INJURY: LIST ALL PERSONS AND ADDRESSES OF PERSONS KNOWN TO HAVE INFORMATION.	
STREET <b>PERRIS, CA 92571</b>	CITY <b>PERRIS, CA 92571</b>	STATE <b>CA</b>	ZIP CODE <b>92571</b>
5. DESCRIBE IN DETAIL HOW DAMAGE OR INJURY OCCURRED:  <b>CLAIMANT WAS HEADED HOME AFTER PLAYING SPORTS WITH FRIENDS. HE WAS TRAVELING EASTBOUND ON E SAN JACINTO AVE MAKING A RIGHT TURN ONTO SOUTHBOUND REDLANDS AVE WHEN HE NOTICED A HIGH SPEED POLICE PURSUIT SPEEDING UP NORTHBOUND REDLANDS AVE. BEFORE CLAIMANT COULD MAKE ATTEMPTS TO AVOID A COLLISION, THE EVADING PARTY COLLIDED INTO CLAIMANT'S VEHICLE.</b>		NAME <b>JUDE NJOFANG</b>	PHONE <b>(240)551-6295</b>
		ADDRESS <b>28333 SOCORRO ST APT 49, MURRIETA, CA 92563</b>	
		NAME	PHONE
		ADDRESS	
6. WERE POLICE OR PARAMEDICS CALLED? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		11. LIST DAMAGES INCURRED TO DATE (attach copies of receipts or repair estimates)  <b>TBD</b>	
7. IF PHYSICIAN/HOSPITAL WAS VISITED DUE TO INJURY, INCLUDE DATE OF FIRST VISIT AND HOSPITAL'S NAME, ADDRESS AND PHONE NUMBER:  DATE OF FIRST VISIT <b>12/08/2023</b>			
PHYSICIAN'S/HOSPITAL'S NAME <b>RUHS MEDICAL</b>			
PHYSICIAN'S/HOSPITAL'S ADDRESS <b>26520 CACTUS AVE MORENO VALLEY CA 92555</b>		TOTAL DAMAGES TO DATE <b>\$ TBD</b>	
PHONE: <b>(951) 486-4000</b>		TOTAL ESTIMATED PROSPECTIVE DAMAGES <b>\$ TBD</b>	

**THIS CLAIM MUST BE SIGNED TO BE VALID. NOTE: PRESENTATION OF A FALSE CLAIM IS A FELONY (PENAL CODE SECTION 72.)**

**WARNING:**

- CLAIMS FOR DEATH, INJURY TO PERSON OR TO PERSONAL PROPERTY MUST BE FILED NOT LATER THAN SIX (6) MONTHS AFTER THE OCCURRENCE. (GOVERNMENT CODE SECTION 911.2)
- ALL OTHER CLAIMS FOR DAMAGES MUST BE FILED NOT LATER THAN ONE (1) YEAR AFTER THE OCCURRENCE. (GOVERNMENT CODE SECTION 911.2)
- SUBJECT TO CERTAIN EXCEPTIONS. YOU HAVE ONLY SIX (6) MONTHS FROM THE DATE OF THE WRITTEN NOTICE OF REJECTION OF YOUR CLAIM TO FILE A COURT ACTION. (GOVERNMENT CODE SECTION 945.6)
- IF WRITTEN NOTICE OF REJECTION OF YOUR CLAIM IS NOT GIVEN, YOU HAVE TWO (2) YEARS FROM ACCRUAL OF THE CAUSE OF ACTION TO FILE A COURT ACTION. (GOVERNMENT CODE SECTION 945.6)

12. CLAIMANT OR PERSON FILING ON HIS/HER BEHALF  <b>ATTORNEY</b>		13. PRINT OR TYPE NAME <b>CHRISTOPHER B. ADAMSON, ESQ. C/O RANSOM NDI NFOR</b>		DATE <b>1-12-24</b>
SIGNATURE		RELATIONSHIP TO CLAIMANT		<b>ELIJAH@AA.LAW / CHRISTOPHER@AA.LAW</b>



**EXHIBIT 4**



OFFICE OF THE  
CLERK OF THE BOARD OF SUPERVISORS  
1st FLOOR, COUNTY ADMINISTRATIVE CENTER  
P.O. BOX 1147, 4080 LEMON STREET  
RIVERSIDE, CA 92502-1147  
PHONE: (951) 955-1060 FAX: (951) 955-1071

**KIMBERLY A. RECTOR**  
Clerk of the Board of Supervisors

**APRIL BOYDD**  
Assistant Clerk of the Board

January 30, 2024

RANSOME NDI NFOR  
C/O ADAMSON AHDOOT INJURY ATTORNEYS  
1150 S. ROBERTSON BLVD.  
LOS ANGELES, CA 90035

**RE: NOTICE OF REJECTION OF CLAIM**

**Claimant(s):** NFOR, Ransome Ndi  
**Date of Loss:** 12/08/2023  
**Claim No:** 033-24  
**Date Claim Received:** 01/23/2024

Notice is hereby given that the claim you presented to the Clerk of the Board of Supervisors was rejected by the Board on January 30, 2024.

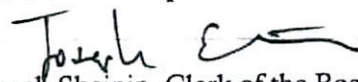
**WARNING**

Subject to certain exceptions, you have only six (6) months from the date this notice was personally delivered or deposited in the mail to file a court action on this claim. See Government Code section 945.6.

You may seek the advice of any attorney of your choice in connection with this matter. If you desire to consult an attorney, you should do so immediately.


This warning, and the six-month deadline, only apply to the extent a lawsuit would be based on California law, and do not apply to the extent a lawsuit would be based on federal law.

Kimberly A. Rector  
Clerk to the Board of Supervisors

By:   
Joseph Sheinin, Clerk of the Board Assistant

I declare that my business address is 1st Floor, County Administrative Center, 4080 Lemon Street, Riverside California, that I am a citizen of the United States of America, employed by the County of Riverside and am not a party to the action. On the date stated below I mailed the foregoing notice by depositing a copy thereof in the outgoing mail at Riverside, California, in a sealed envelope, with postage prepaid, addressed to the person(s) listed above. I declare under penalty of perjury that the foregoing is true and correct.

Executed at Riverside, California on January 30, 2024.

  
Joseph Sheinin, Clerk of the Board Assistant  
GL090

RM: 202341059

**EXHIBIT 5**



STATE OF CALIFORNIA  
**GOVERNMENT CLAIM**  
 DGS ORIM 006 (Rev. 08/19)

DEPARTMENT OF GENERAL SERVICES  
 OFFICE OF RISK AND INSURANCE MANAGEMENT

CLAIMANT INFORMATION			
LAST NAME NFOR	FIRST NAME RANSOME	MIDDLE INITIAL N.	
INMATE OR PATIENT IDENTIFICATION NUMBER (if applicable) N/A	BUSINESS NAME (if applicable) N/A		
TELEPHONE NUMBER (310)888-0024	EMAIL ADDRESS ELIJAH@AA.LAW / CHRISTOPHER@AA.LAW		
MAILING ADDRESS 1150 S ROBERTSON BLVD	CITY LOS ANGELES	STATE CA	ZIP 90035
IS THE CLAIMANT UNDER 18 YEARS OF AGE? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	INSURED NAME (Insurance Company Subrogation)		
IS THIS AN AMENDMENT TO A PREVIOUSLY EXISTING CLAIM? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	EXISTING CLAIM NUMBER (if applicable)	EXISTING CLAIMANT NAME (if applicable)	

ATTORNEY OR REPRESENTATIVE INFORMATION			
LAST NAME ADAMSON	FIRST NAME CHRISTOPHER	MIDDLE INITIAL B.	
TELEPHONE NUMBER (310)888-0024	EMAIL ADDRESS ELIJAH@AA.LAW / CHRISTOPHER@AA.LAW		
MAILING ADDRESS 1150 S ROBERTSON BLVD	CITY LOS ANGELES	STATE CA	ZIP 90035

CLAIM INFORMATION	
STATE AGENCIES OR EMPLOYEES AGAINST WHOM THE CLAIM IS FILED STATE OF CALIFORNIA, CITY OF PERRIS, COUNTY OF RIVERSIDE, RIVERSIDE COUNTY SHERIFF, DEPUTY LABACO #5797	DATE OF INCIDENT 12/08/2023
LATE CLAIM EXPLANATION (Required, if incident was more than six months ago)  N/A	

DOLLAR AMOUNT OF CLAIM TBD	CIVIL CASE TYPE (Required, if amount is more than \$10,000) <input type="checkbox"/> Limited (\$25,000 or less) <input checked="" type="checkbox"/> Non-Limited (over \$25,000)
DOLLAR AMOUNT EXPLANATION TBD	
INCIDENT LOCATION REDLANDS AVE / E SAN JACINTO AVE - PERRIS, CA	
SPECIFIC DAMAGE OR INJURY DESCRIPTION TBD	

CIRCUMSTANCES THAT LED TO DAMAGE OR INJURY  
 CLAIMANT WAS HEADED HOME AFTER PLAYING SPORTS WITH FRIENDS. HE WAS TRAVELING EAST ON E SAN JACINTO AVE MAKING A LEFT TURN ONTO NORTHBOUND REDLANDS AVE WHEN HE NOTICED A HIGH SPEED POLICE PURSUIT SPEEDING DOWN SOUTHBOUND REDLANDS AVE. BEFORE CLAIMANT COULD MAKE ATTEMPTS TO AVOID A COLLISION, THE EVADING PARTY COLLIDED INTO CLAIMANT'S VEHICLE.

EXPLAIN WHY YOU BELIEVE THE STATE IS RESPONSIBLE FOR THE DAMAGE OR INJURY  
 CLAIMANT WAS A VICTIM OF NEGLIGENCE ON BEHALF OF THE CITY OF PERRIS, THE COUNTY OF RIVERSIDE, THE STATE OF CALIFORNIA, AND THE RIVERSIDE COUNTY SHERIFF DEPARTMENT DUE TO THE PRIMARY CRASH FACTOR BEING A HIGH SPEED PURSUIT.




STATE OF CALIFORNIA  
**GOVERNMENT CLAIM**  
 DGS ORIM 006 (Rev. 08/19)

DEPARTMENT OF GENERAL SERVICES  
 OFFICE OF RISK AND INSURANCE MANAGEMENT

AUTOMOBILE CLAIM INFORMATION		
DOES THE CLAIM INVOLVE A STATE VEHICLE? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	VEHICLE LICENSE NUMBER (if known) UNKNOWN	STATE DRIVER NAME (if known) DEPUTY LABACO #5797
HAS A CLAIM BEEN FILED WITH YOUR INSURANCE CARRIER? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	INSURANCE CARRIER NAME PROGRESSIVE	INSURANCE CLAIM NUMBER 23-4405441
HAVE YOU RECEIVED AN INSURANCE PAYMENT FOR THIS DAMAGE OR INJURY? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AMOUNT RECEIVED (if any) \$0.00	AMOUNT OF DEDUCTIBLE (if any) \$500.00

**NOTICE AND SIGNATURE**

I declare under penalty of perjury under the laws of the State of California that all the information I have provided is true and correct to the best of my information and belief. I further understand that if I have provided information that is false, intentionally incomplete, or misleading I may be charged with a felony punishable by up to four years in state prison and/or a fine of up to \$10,000 (Penal Code section 72).

SIGNATURE 	PRINTED NAME CHRISTOPHER B. ADAMSON, ESQ. C/O RANSOM NDI NFOR	DATE 1-12-24
--	--	-----------------

**INSTRUCTIONS**

- Include a check or money order for \$25, payable to the State of California.
  - \$25 filing fee is not required for amendments to existing claims.
- Confirm all sections relating to this claim are complete and the form is signed.
- Attach copies of any documentation that supports your claim. Do not submit originals.

Mail the claim form and all attachments to:  
 Office of Risk and Insurance Management  
 Government Claims Program  
 P.O. Box 989052, MS414  
 West Sacramento, CA 95798-9052

Claim forms can also be delivered to:  
 Office of Risk and Insurance Management  
 Government Claims Program  
 707 3rd Street, 1st Floor  
 West Sacramento, CA 95605  
 1-800-955-0045

**Department of General Services Privacy Notice on Information Collection**

This notice is provided pursuant to the Information Practices Act of 1977, California Civil Code Sections 1798.17 & 1798.24 and the Federal Privacy Act (Public Law 93-579).

The Department of General Services (DGS), Office of Risk and Insurance Management (ORIM), is requesting the information specified on this form pursuant to Government Code Section 905.2(c).

The principal purpose for requesting this data is to process claims against the state. The information provided will/may be disclosed to a person, or to another agency where the transfer is necessary for the transferee-agency to perform its constitutional or statutory duties, and the use is compatible with a purpose for which the information was collected and the use or transfer is accounted for in accordance with California Civil Code Section 1798.25.

Individuals should not provide personal information that is not requested.

The submission of all information requested is mandatory unless otherwise noted. If you fail to provide the information requested to DGS, or if the information provided is deemed incomplete or unreadable, this may result in a delay in processing.

**Department Privacy Policy**  
 The information collected by DGS is subject to the limitations in the Information Practices Act of 1977 and state policy (see State Administrative Manual 5310-5310.7). For more information on how we care for your personal information, please read the [DGS Privacy Policy](#).

**Access to Your Information**  
 ORIM is responsible for maintaining collected records and retaining them for 5 years. You have a right to access records containing personal information maintained by the state entity. To request access, contact:

**DGSORIM**  
 Public Records Officer  
 707 3<sup>rd</sup> St., West Sacramento, CA 95605  
 (916) 376-5300



Electronically FILED by Superior Court of California, County of Riverside on 03/22/2024 12:55 PM

Case Number CVRI2401530 0000087761154 - Jason B. Galkin, Executive Officer/Clerk of the Court By Joseline DeRosier, Clerk

CM-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Christopher B. Adamson, Esq. (State Bar No. 238500) Adamson Ahdoot LLP, 1150 S. Robertson Blvd., Los Angeles, CA 90035  TELEPHONE NO.: 310.888.0024 FAX NO.: 888.895.4665 EMAIL ADDRESS: christopher@aa.law ATTORNEY FOR (Name): Plaintiff - Ransome Ndi Nfor	<b>FOR COURT USE ONLY</b>
<b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE</b> STREET ADDRESS: 4050 Main Street MAILING ADDRESS: CITY AND ZIP CODE: Riverside, CA 92501 BRANCH NAME: Riverside Historic Courthouse	
CASE NAME: Nfor v. City of Perris, et al.	
<b>CIVIL CASE COVER SHEET</b> <input checked="" type="checkbox"/> <b>Unlimited</b> (Amount demanded exceeds \$35,000) <input type="checkbox"/> <b>Limited</b> (Amount demanded is \$35,000 or less)	<b>Complex Case Designation</b> <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)
	CASE NUMBER: <b>CVRI2401530</b>  JUDGE: DEPT.:

*Items 1-6 below must be completed (see instructions on page 2).*

1. Check **one** box below for the case type that best describes this case:

<b>Auto Tort</b> <input checked="" type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) <b>Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort</b> <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other PI/PD/WD (23) <b>Non-PI/PD/WD (Other) Tort</b> <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-PI/PD/WD tort (35) <b>Employment</b> <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	<b>Contract</b> <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37) <b>Real Property</b> <input type="checkbox"/> Eminent domain/Inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) <b>Unlawful Detainer</b> <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) <b>Judicial Review</b> <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	<b>Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403)</b> <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) <b>Enforcement of Judgment</b> <input type="checkbox"/> Enforcement of judgment (20) <b>Miscellaneous Civil Complaint</b> <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint ( <i>not specified above</i> ) (42) <b>Miscellaneous Civil Petition</b> <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition ( <i>not specified above</i> ) (43)
---	--	--

2. This case  is  is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- |  |  |
|--|--|
| a. <input type="checkbox"/> Large number of separately represented parties   | d. <input type="checkbox"/> Large number of witnesses  |
| b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve | e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court |
| c. <input type="checkbox"/> Substantial amount of documentary evidence   | f. <input type="checkbox"/> Substantial postjudgment judicial supervision  |
3. Remedies sought (*check all that apply*): a.  monetary b.  nonmonetary; declaratory or injunctive relief c.  punitive
4. Number of causes of action (*specify*): (2)
5. This case  is  is not a class action suit.
6. If there are any known related cases, file and serve a notice of related case. (*You may use form CM-015.*)

Date: March 22, 2024  
 Christopher B. Adamson, Esq.

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

(TYPE OR PRINT NAME)

**NOTICE**

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.



**INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET**

**CM-010**

**To Plaintiffs and Others Filing First Papers.** If you are filing a first paper (for example, a complaint) in a civil case, you **must** complete and file, along with your first paper, the Civil Case Cover Sheet contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check **one** box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the **primary** cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

**To Parties in Rule 3.740 Collections Cases.** A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

**To Parties in Complex Cases.** In complex cases only, parties must also use the Civil Case Cover Sheet to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

**CASE TYPES AND EXAMPLES**

**Auto Tort**

- Auto (22)–Personal Injury/Property Damage/Wrongful Death
- Uninsured Motorist (46) *(if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto)*

**Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort**

- Asbestos (04)
  - Asbestos Property Damage
  - Asbestos Personal Injury/Wrongful Death
- Product Liability *(not asbestos or toxic/environmental)* (24)
- Medical Malpractice (45)
  - Medical Malpractice–Physicians & Surgeons
- Other Professional Health Care Malpractice
- Other PI/PD/WD (23)
  - Premises Liability (e.g., slip and fall)
  - Intentional Bodily Injury/PD/WD (e.g., assault, vandalism)
  - Intentional Infliction of Emotional Distress
  - Negligent Infliction of Emotional Distress

**Non-PI/PD/WD (Other) Tort**

- Business Tort/Unfair Business Practice (07)
- Civil Rights (e.g., discrimination, false arrest) *(not civil harassment)* (08)
- Defamation (e.g., slander, libel) (13)
- Fraud (16)
- Intellectual Property (19)
- Professional Negligence (25)
  - Legal Malpractice
  - Other Professional Malpractice *(not medical or legal)*
- Other Non-PI/PD/WD Tort (35)

**Employment**

- Wrongful Termination (36)
- Other Employment (15)

**Contract**

- Breach of Contract/Warranty (06)
  - Breach of Rental/Lease
  - Contract *(not unlawful detainer or wrongful eviction)*
- Contract/Warranty Breach–Seller Plaintiff *(not fraud or negligence)*
- Negligent Breach of Contract/Warranty
- Other Breach of Contract/Warranty
- Collections (e.g., money owed, open book accounts) (09)
- Collection Case–Seller Plaintiff
- Other Promissory Note/Collections Case
- Insurance Coverage *(not provisionally complex)* (18)
  - Auto Subrogation
  - Other Coverage
- Other Contract (37)
  - Contractual Fraud
  - Other Contract Dispute

**Real Property**

- Eminent Domain/Inverse Condemnation (14)
- Wrongful Eviction (33)
- Other Real Property (e.g., quiet title) (26)
  - Writ of Possession of Real Property
  - Mortgage Foreclosure
  - Quiet Title
  - Other Real Property *(not eminent domain, landlord/tenant, or foreclosure)*

**Unlawful Detainer**

- Commercial (31)
- Residential (32)
  - Drugs (38) *(if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential)*

**Judicial Review**

- Asset Forfeiture (05)
- Petition Re: Arbitration Award (11)
- Writ of Mandate (02)
  - Writ–Administrative Mandamus
  - Writ–Mandamus on Limited Court Case Matter
  - Writ–Other Limited Court Case Review
- Other Judicial Review (39)
  - Review of Health Officer Order
  - Notice of Appeal–Labor Commissioner Appeals

**Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400–3.403)**

- Antitrust/Trade Regulation (03)
- Construction Defect (10)
- Claims Involving Mass Tort (40)
- Securities Litigation (28)
- Environmental/Toxic Tort (30)
- Insurance Coverage Claims *(arising from provisionally complex case type listed above)* (41)

**Enforcement of Judgment**

- Enforcement of Judgment (20)
  - Abstract of Judgment (Out of County)
- Confession of Judgment *(non-domestic relations)*
- Sister State Judgment
- Administrative Agency Award *(not unpaid taxes)*
- Petition/Certification of Entry of Judgment on Unpaid Taxes
- Other Enforcement of Judgment Case

**Miscellaneous Civil Complaint**

- RICO (27)
- Other Complaint *(not specified above)* (42)
  - Declaratory Relief Only
  - Injunctive Relief Only *(non-harassment)*
  - Mechanics Lien
  - Other Commercial Complaint Case *(non-tort/non-complex)*
  - Other Civil Complaint *(non-tort/non-complex)*

**Miscellaneous Civil Petition**

- Partnership and Corporate Governance (21)
- Other Petition *(not specified above)* (43)
  - Civil Harassment
  - Workplace Violence
  - Elder/Dependent Adult Abuse
  - Election Contest
  - Petition for Name Change
  - Petition for Relief From Late Claim
  - Other Civil Petition



Electronically FILED by Superior Court of California, County of Riverside on 03/22/2024 12:55 PM  
Case Number CVRI2401530 0000087761156 - Jason B. Galkin, Executive Officer/Clerk of the Court By Joseline DeRosier, Clerk

**SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE**

- BANNING 311 E. Ramsey St., Banning, CA 92220
- BLYTHE 265 N. Broadway, Blythe, CA 92225
- CORONA 505 S. Buena Vista, Rm. 201, Corona, CA 92882
- MORENO VALLEY 13800 Heacock St., Ste. D201, Moreno Valley, CA 92553
- MURRIETA 30755-D Auld Rd., Suite 1226, Murrieta, CA 92563
- PALM SPRINGS 3255 E. Tahquitz Canyon Way, Palm Springs, CA 92262
- RIVERSIDE 4050 Main St., Riverside, CA 92501

RI-CI032

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar Number and Address) <b>Christopher B. Adamson, Esq. (State Bar No. 238500)</b> <b>Adamson Ahdoot LLP</b> <b>1150 S. Robertson Blvd.</b> <b>Los Angeles, CA 90035</b>  TELEPHONE NO: 310.888.0024      FAX NO. (Optional): 888.895.4665 E-MAIL ADDRESS (Optional): christopher@aa.law ATTORNEY FOR (Name): Plaintiff - Ransome Ndi Nfor	FOR COURT USE ONLY          CASE NUMBER: <b>CVRI 2401530</b>
PLAINTIFF/PETITIONER: Ransome Ndi Nfor  DEFENDANT/RESPONDENT: City of Perris, et al.	

**CERTIFICATE OF COUNSEL**

The undersigned certifies that this matter should be tried or heard in the court identified above for the reasons specified below:

- The action arose in the zip code of: 92571
- The action concerns real property located in the zip code of: \_\_\_\_\_
- The Defendant resides in the zip code of: \_\_\_\_\_

For more information on where actions should be filed in the Riverside County Superior Courts, please refer to Local Rule 3115 at [www.riverside.courts.ca.gov](http://www.riverside.courts.ca.gov).

I certify (or declare) under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date March 22, 2024

Christopher B. Adamson, Esq.  
(TYPE OR PRINT NAME OF  ATTORNEY  PARTY MAKING DECLARATION)

▶   
(SIGNATURE)