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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF KERN

CHRISTINA SCOTT,

Plaintiff,

vs.

GREYHOUND LINES, INC.; FIRST GROUP
AMERICA, INC., and DOES 1 through 50,
Inclusive,

Defendants.

CASE NO:

COMPLAINT FOR DAMAGES

1. NEGLIGENCE
2. NEGLIGENT HIRING, TRAINING,
RETAINING, SUPERVISING AND
EQUIPPING

AND DEMAND FOR JURY TRIAL

COMES NOW, Plaintiff CHRISTINA SCOTT (hereinafter "Plaintiff") and for her causes of
action against Defendants and each of them, complains and alleges as follows:

PARTIES

1. Defendant, GREYHOUND LINES, INC., is and at all times relevant herein was, a
private corporation, organized and existing pursuant to and under the laws of the State of Delaware,
with its principal place of business at 350 North St. Paul Street, Dallas, Texas. At all times
mentioned, said Defendant was and is lawfully doing business in the State of California as a common
carrier, transporting members of the general public for a fee.

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**COMPLAINT FOR DAMAGES -- 1. NEGLIGENCE; 2. NEGLIGENT HIRING, TRAINING,
RETAINING, SUPERVISING AND EQUIPPING -- AND DEMAND FOR JURY TRIAL**

1 2. Defendant, FIRST GROUP AMERICA, INC., is and at all times relevant herein was, a
2 private corporation, organized and existing pursuant to and under the laws of the State of Delaware,
3 with its principal place of business at 600 Vine Street, Suite 1400, Cincinnati, Ohio. At all times
4 mentioned, said Defendant was and is lawfully doing business in the State of California as a common
5 carrier, transporting members of the general public for a fee.
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8 3. Defendants GREYHOUND LINES, INC., and FIRST GROUP OF AMERICA, INC.,
9 their principals, agents and employees, shall collectively be referred to herein as “GREYHOUND”.

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11 4. Plaintiff CHRISTINA SCOTT, a fee paying passenger on Defendant’s bus (schedule
12 6848-1) traveling from Los Angeles to the Bay Area in the early-morning hours of February 3, 2020,
13 is and was at all times herein mentioned, an individual residing in the State of California.
14

15 5. Plaintiff is ignorant of the true names and capacities, whether individual, corporate or
16 otherwise, of Defendants sued herein as DOES 1 – 50, inclusive, and therefore sues these Defendants
17 by such fictitious names. Plaintiff will amend this Complaint to allege their true names and capacities
18 when ascertained. Plaintiff is informed and believes and thereon alleges that each of the fictitiously
19 named Defendants is negligently and/or in some other fashion responsible for the occurrences herein
20 alleged, and the Plaintiff’s injuries as herein alleged were proximately caused by such negligence
21 and/or other wrongful conduct.
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24 6. Plaintiff is informed and believes and thereupon alleges that at all times mentioned
25 herein, Defendants and each of them, including DOES 1 through 50, inclusive, and each of them,
26 were the agents, servants, employees and/or joint venturers of their co-Defendants, and each was, as
27 such, acting within the course, scope and authority of said agency, employment or venture. And that
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1 each and every Defendant, as aforesaid, when acting as a principal, was negligent in the selection and
2 hiring of each and every other Defendant as an agent, employee and/or joint venturer.

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4 7. There exists, and at all times herein alleged, there existing, a unity of interest in
5 ownership between certain Defendants and other certain Defendants such that any individuality and
6 separateness between the certain Defendants has ceased and these Defendants are the alter-ego of the
7 other certain Defendants and exerted control over those Defendants. Adherence to the fiction of the
8 separate existence of these certain Defendants as an entity distinct from other certain Defendants will
9 permit an abuse of the corporate privilege and would sanction fraud and would promote injustice.
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12 8. At all times herein mentioned, each of the Defendants identified herein acted as the
13 authorized agents and representatives of each of the other Defendants in the acts, errors and or
14 omissions herein alleged. At all times herein mentioned the driver, identified as driver DOE 1 was an
15 agent and/or employee of the GREYHOUND Defendants, and DOES 2-50 were agents of said carrier
16 Defendants, and were all acting within the course and scope of their agency and/or employment,
17 and/or with the knowledge, consent, acquiescence and/or ratification of the remaining Defendants.
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20 9. The negligence and/or other wrongful conduct of each Defendant identified herein
21 combined and cooperated with the negligence of each of the remaining Defendants so as to cause
22 and/or contribute to the herein described occurrence and the resulting loss, damage and/or injuries to
23 Plaintiff.
24

25 **JURISDICTION AND VENUE**

26 10. Venue and jurisdiction are proper because the damages to Plaintiff was caused by the
27 wrongful actions and omissions of Defendants, and each of them, all of which resulted in injury with
28 Kern County, State of California.

1 otherwise unstable individuals has been well known to GREYHOUND for more than two decades,
2 yet Defendants have continually refused to meaningfully implement these well-known and accepted
3 methods to provide their passengers with the safety and security from criminal attack to which they
4 are entitled. Thus, incidents of violent criminal conduct on buses have continued over the years due
5 to Defendants' negligence and/or wrongful conduct. Protecting fare-paying passengers from the
6 known and pervasive risk of violent criminal attack onboard buses is part of the obligation to provide
7 reasonably safe travel that GREYHOUND assumes when it invites the problems (after paying a fee)
8 onto its buses for transportation over the highways of North America. Not only have Defendants
9 failed to make inquiry of and/or otherwise adequately screen passengers before boarding their buses,
10 but they have also failed to inform their fare-paying passengers of the risk that they could be (and are)
11 routinely victimized by violent criminal attacks during the bus transit. As a result, passengers are
12 lulled into a false sense of security, falsely believing that GREYHOUND has taken appropriate steps
13 to protect them.
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17 14. In addition, GREYHOUND bus drivers are inadequately trained, tested, monitored,
18 equipped and supervised, not only on the procedures and devices to adequately screen passengers so
19 as to prevent those carrying weapons from boarding GREYHOUNND buses, but also on how to
20 identify and immediately respond, in an efficient and effective fashion, when disruptions occur
21 onboard buses in transit that could (and do) lead to violence. As a result, over the past 20 years,
22 GREYHOUND'S drivers have repeatedly allowed occurrences of passenger disturbances to escalate
23 out of control, leading to violent assaults against not only passengers, but also bus drivers while in
24 transit, causing injury to innocent passengers traveling on GREYHOUND buses. These disturbances
25 are often the result of GREYHOUND allowing obviously intoxicated and/or mentally unstable
26 individuals to board its buses unscreened and unmonitored and/or remain on its buses in transit once
27 disruptive behavior commences.
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1 15. At all times mentioned herein, Defendants GREYHOUND and DOES 1-50, and each
2 of them, owned, selected, equipped, operated, maintained, inspected, monitored, controlled, loaded
3 and/or drove their bus on schedule 6848-1 (hereinafter, the “subject bus”) and/or allowed 42
4 passengers, including the assailant, entry onto the subject bus on the night of February 2, 2020, at Los
5 Angeles, bound for the Bay Area, without any and/or adequate security screening.
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8 16. By scheduling and running hours-long routes during the late night/early morning
9 hours, such as that from Los Angeles to the Bat Area, Defendants, and each of them, heightened the
10 aforementioned inherent and foreseeable risk that they were transporting one or more passengers who
11 were carrying weapons and/or were violent, intoxicated, mentally unstable and/or intent on using the
12 above-referenced characteristics of bus travel to commit a violent crime on February 3, 2020. The
13 subject bus was crowded, noisy, poorly managed, carelessly monitored, and negligently loaded and
14 operated. Moreover, Defendant GREYHOUND and DOES 2-50, inclusive, and each of them,
15 unilaterally charged a single person, the driver, with the sole responsibility of properly and safely
16 boarding and transporting large groups of the general public without any assistance. Despite
17 imposing this responsibility o their drivers, Defendants GREYHOUND and DOES 2-5-, inclusive,
18 and each of them, failed to adequately train, supervise, support, monitor, authorize or equip or their
19 drivers to effectively control, patrol, screen, monitor, evaluate, aid, regulate or guard passengers in a
20 meaningful way.
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24 17. Defendants, and each of them, placed and entrusted the responsibility for safe carriage
25 of each of their 42 passengers on the subject bus, including Plaintiff, with the inadequately trained,
26 supported and equipped driver of the subject bus, whose identity as an individual is currently
27 unknown but whom Plaintiff herein refers to as “driver DOE 1”. Upon information and belief,
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**COMPLAINT FOR DAMAGES -- 1. NEGLIGENCE; 2. NEGLIGENT HIRING, TRAINING,
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1 Plaintiff alleges driver DOE 1 was at all times operating the subject bus on February 3, 2020, in his
2 full capacity and authority as an employee and/or agent for Defendants GREYHOUND and DOES 2-
3 50, and each of them and at all times herein was acting under the full course and scope of that agency
4 and/or employment.
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7 18. Each of the 42 passengers who boarded the subject bus (schedule 6848-1) in Los
8 Angeles on the night of February 2, 2020, with the exception of the assailant, was dependent and
9 reasonably relying on driver DOE 1, who was acting in his actual and apparent authority as the only
10 agent and/or employee of Defendants GREYHOUND on this trip, to detect, prevent, protect and act
11 upon reasonably foreseeable dangers and threats to the passengers before they boarded and while they
12 were on the bus, to summon help in transit, and/or facilitate a means of escape for passengers in
13 transit in situations where their safety is threatened by passengers who become disruptive, unruly,
14 and/or dangerous.
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17 19. By their own negligence and/or by their wrongful conduct as alleged herein,
18 Defendants, and each of them, allowed the assailant to board the subject bus at Defendants' facilities
19 in Union Station, Los Angeles, carrying a firearm, though clearly exhibiting behavior indicative that
20 he was either mentally unstable and/or under the influence of intoxicants. This abhorrent behavior
21 was exhibited by the assailant from time to time that he boarded the subject bus and continued
22 throughout the transit. The assailant was disruptive, verbally combative and abusive, and spoke
23 incoherently, issuing expletives and arguing with fellow passengers. At one point, upon being told by
24 a passenger in Spanish to quiet down, the assailant threatened that passenger with words to the effect
25 of, "Just wait until we get to the station." Defendant driver DOE 1 was oblivious to and did not
26 intercede or otherwise react to the ongoing disruptive conduct of the assailant.
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**COMPLAINT FOR DAMAGES -- 1. NEGLIGENCE; 2. NEGLIGENT HIRING, TRAINING,
RETAINING, SUPERVISING AND EQUIPPING -- AND DEMAND FOR JURY TRIAL**

1 20. Defendants and each of them, did not screen the assailant in any fashion before he
2 boarded the subject bus and therefore Defendants failed to recognize and act on the threat of
3 imminent harm the assailant presented to the passengers on the subject bus. In doing so, Defendants,
4 and each of them, did nothing to exclude the assailant from boarding the subject bus and/or otherwise
5 ensure he was not a threat to the safety and/or wellbeing of the other passengers on that bus, including
6 Plaintiff. Defendants, and each of them, did not even question the assailant before he boarded the
7 bus and/or after its departure, did not check his person or carry-on luggage or in any other fashion
8 screen the assailant for weapons; did not assess the assailant for possible intoxication or a violent
9 mental illness before allowing him on the bus; did not have another employee on the bus to assist the
10 driver; did not demand that the assailant cease bothering other passengers; did not stop the assailant
11 from bothering other passengers; did not direct him to leave the bus as his disruptive behavior
12 escalated and became more threatening, all in spite of the disruption and hostility the assailant
13 exhibited prior to and during this trip. Had Defendants done any of the foregoing, they would and
14 should have prevented entry of the armed assailant on the subject bus and/or ejected him prior to the
15 occurrence.
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19 21. Approximately one hour after leaving Defendants' facilities at Union Station, Los
20 Angeles, the assailant, whose aggressive behavior had continued to escalate unabated, stood up in a
21 pitch-black bus, shouted "Fuck you, fuck all of you!", pulled out a handgun from inside his jacket and
22 started firing wildly. Numerous shots rang out within the bus (perhaps as many as 9 or 10), and yet
23 the bus driver continued to drive. Passengers were screaming, fearing for their lives, diving for the
24 floor. The flashes of gunfire could be seen throughout the bus. Passengers scattered in an effort to
25 save themselves. Plaintiff CHRISTINA SCOTT was shot twice in the chest and once in the shoulder
26 by the assailant.
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**COMPLAINT FOR DAMAGES -- 1. NEGLIGENCE; 2. NEGLIGENT HIRING, TRAINING,
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1 22. Even after the assailant fired several rounds at passengers, driver DOE 1 remained
2 either totally unaware of, or certainly unresponsive to, what was occurring. He continued driving the
3 subject bus as if nothing had happened. He eventually pulled over onto the interstate shoulder
4 because he believed the sounds of 9 to 10 gunshots had, in fact, come from the subject's bus' engine.
5 Plaintiff is informed and believes that other passengers managed to disarm and eject the assailant
6 from the bus, and it was only after the traumatized passengers screamed at driver DOE 1 to drive
7 away that he finally realized the situation and acted to transport the passengers away from danger
8 presented by the now ejected assailant.
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11 23. Defendants, and each of them, knew that their employees and/or agents, including
12 driver DOE 1, was inadequately trained, tested, managed, monitored, supervised, supported, prepared,
13 and/or equipped to handle the known risk of violence on buses in transit, so passengers on the subject
14 bus became victims of such violence. Specifically, Defendants GREYHOUND and DOES 2-50, and
15 each of them, knew that asking a single driver such as driver DOE 1 to be simultaneously singularly
16 charged with not only the responsibility for screening passengers and safely transporting them, but
17 also for detecting and de-escalating dangerous situations involving disruptive and violent passengers
18 onboard their buses in transit, was an expectation beyond anyone's reasonable abilities. Defendants
19 GREYHOUND and DOES 2-50 could not reasonably have expected, given the inadequate training,
20 supervision, support and equipment provided to their drivers, that one single agent and/or employee,
21 such as driver DOE 1, could meet so many significant and specialized demands, especially in the
22 middle of the night with a crowded bus, Defendants GREYHOUND and DOE 2-50, and each of
23 them, failed to train and/or inadequately trained and equipped its bus drivers, including driver DOE 1
24 with any of the reasonably available pre-screening and on-board safety protocols and had not
25 provided adequately safety equipment for driver DOE 1's use.
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1 24. Prior to February 3, 2020, Defendants GREYHOUND and DOES 2-50, and each of
2 them, well knew of the devices and procedures available to them, and had the means to reasonably
3 protect passengers from the known risk of armed criminal assaults, without compromising the bus
4 driver's ability to safely operate the bus. Defendants GREYHOUND and DOES 2-50 had significant
5 prior notice of the likelihood of criminal assaults occurring on its buses in transit and could have and
6 should have meaningfully upgraded the overall safety of its buses, its operation, and its operators. In
7 fact, GREYHOUND previously vowed to and represented to the public that it had implemented
8 effective safety procedures to address the risk. Instead, Defendants chose to ignore the risk and
9 allowed major shortcomings to persist in their onboard and pre-screening procedures, even while
10 individual acts of violence on buses in transit in North America continued to occur on a monthly
11 basis.
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15 25. At all times herein, said Defendants, and each of them, failed to implement any
16 adequate safety measures/devices to guard against in-transit acts of violence against passengers,
17 notwithstanding their knowledge of the availability of devices and procedures for many years prior to
18 this incident. Said Defendants, and each of them, could and should have implemented one or more of
19 these devices/procedures, including: an onboard security guard; stationary facility metal detectors
20 and/or and held metal detectors to screen oncoming passengers for weapons; physical security
21 enhancements such as, for instance, surveillance equipment or a wireless transmitter coupled with a
22 standard industry GPS device to facilitate instant communication with police officers and other
23 authorities who would be providing aid, and/or with Defendants' employees, if violence occurs
24 onboard. However, Defendants, and each of them, failed to implement any of these effective
25 passenger screening and security procedures.
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1 30. The special nature of the relation between a common carrier and its passengers
2 imposes a heightened duty of care upon Defendants named herein to protect passengers from the
3 known risk of violent criminal attack. The known passed history of outbreaks of violence between
4 passengers and by passengers against drivers required affirmative action by Defendants in an effort to
5 prevent these attacks. Specifically, GREYHOUND bus passengers, such as those on the subject bus,
6 routinely experience bus conditions that were crowded, noisy, uncomfortable and, as alleged herein,
7 even dangerous. Defendants, and each of them, effectively seal their passengers in a moving box
8 with total strangers in very close proximity with one another. The driver of GREYHOUND buses
9 exclusively controls passenger ingress and egress and the safety of passengers in transit. If an
10 emergency occurs in transit, passengers are wholly dependent upon Defendants and their driver for
11 protection, to summon help and to provide a means of safe escape.
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15 31. Defendants and each of them, knew or should have known that adopting the above-
16 referenced, well known precautionary measures (and others) to ensure that none of the passengers that
17 were allowed to board the subject bus on the night of February 2, 2020, were armed, dangerous, or
18 otherwise presented a threat of imminent harm to innocent passengers on board, was necessary to
19 accomplish Defendants' ultimate obligation: the safe transportation of all passengers, including
20 Plaintiff to their final destination. Plaintiff reasonably relied on Defendants, and each of them, for
21 such safe transportation to their destination upon buying a ticket on Defendants' bus line and
22 thereafter boarding Defendants' bus.
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25 32. Defendants, and each of them, despite Plaintiff's reasonable reliance, breached their
26 duty to Plaintiff by failing to exercise the utmost care and diligence reasonably possible to render safe
27 transportation services, in that Defendants, and each of them, failed to: (1) give all passengers,
28 including the assailant and Plaintiff a reasonable degree of pre-boarding screening and attention;

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1 (2) provide adequate warning to passengers, including Plaintiff, of the known danger of criminal
2 attack on buses in transit; (3) implement adequate procedures and equipment directed towards
3 protecting passengers, including plaintiff, from harm from violence at the hands of another passenger,
4 including the assailant; and (4) equip, support and ensure proper training to address violence in
5 transit for their own employees, including driver DOE 1.
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8 33. Defendants, and each of them, failed to fully or reasonably discharge their obligation
9 to their passengers and essentially abandoned their passengers, including Plaintiff, leaving her to
10 somehow defend against the assailant's violent assault, despite knowing the degree to which
11 GREYHOUND passengers, including Plaintiff, were at potential risk and unable to protect
12 themselves and/or flee the danger given the crowded condition of the subject bus.
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15 34. The failure of the Defendants, and each of them, to exercise the utmost care and
16 diligence in discharging their obligations to Plaintiff to provide safe transportation was a substantial
17 factor in causing Plaintiff's physical harm, shock, fear, horror, emotional distress and anxiety because
18 Defendants, and each of them, knew all passengers, including Plaintiff, were in such a position which
19 left them helpless to protect themselves and/or to escape the subject bus and left them in peril from
20 the lack of any adequate safety measures to reduce, prevent, eliminate, or mitigate, the foreseeable
21 risk of violence against passengers at the hand of other passengers.
22

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24 35. The failure of Defendants, and each of them, to exercise the utmost duty of care added
25 to Plaintiff's risk of harm in that driver DOE 1 carelessly allowed the violent, armed, intoxicated
26 and/or mentally unstable assailant to board the bus and thereafter to remain on the bus, even though the
27 risk the assailant presented to GREYHOUND's passengers was, or should have been anticipated
28 and/or was so obvious from the moment the assailant arrived at the bus for boarding as well as

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1 thereafter, Defendants, and each of them, failed to preserve the safety of passengers, despite having
2 observed the assailant's erratic, confrontational and hostile demeanor, and failed to act to prevent the
3 harm, shock and/or emotional distress suffered by the Plaintiff.
4

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6 36. As a legal, direct and proximate result of the aforesaid misconduct of Defendant
7 GREYHOUND and DOES 1-50, and each of them, Plaintiff suffered an extremely traumatic (and
8 entirely avoidable) episode of criminal violence upon the subject bus on February 3, 2020. As a
9 result, Plaintiff experienced intense fear, feelings of abject helplessness, and horror. Living through
10 this terror has caused Plaintiff to experience and/or develop recurrent flashbacks of the event,
11 nightmares, panic attacks, avoidance behavior and other behavioral changes, mood swings, outbursts
12 of anger, negative cognition, and estrangement, causing persistent fear, shock, anger, nervousness,
13 anxiety, hypervigilance and guilt. These symptoms have continued in Plaintiff and have negatively
14 impacted her daily life, through and including the present.
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17 37. As a direct legal and proximate result of the aforementioned misconduct of
18 Defendants, and each of them, Plaintiff was compelled to, and did employ the services of medical
19 doctors, therapists and specialists for care, consultation for treatment, and has also incurred other
20 incidental expenses for her care. Plaintiff is informed and believes, and thereon alleges that by reason
21 of each of her injuries she will necessarily incur additional like expenses for an indefinite period of
22 time in the future, the exact amount of which expenses will be stated according to proof.
23

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25 38. As a direct legal and proximate result of the aforementioned conduct of Defendants,
26 and each of them, Plaintiff was prevented from attending her usual and customary employment.
27 Plaintiff is informed and believes, and thereupon alleges, that she will be prevented from attending
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1 her occupation in the future, and thereby will also sustain a loss of earning capacity and loss of
2 opportunity, in addition to lost earnings, past, present and future, according to proof.

3
4 **SECOND CAUSE OF ACTION**

5 **For Negligent Hiring, Training, Retaining, Supervising and Equipping**

6 **Against Defendants, GREYHOUND LINES, INC., FIRST GROUP AMERICA, INC., and DOES 2-50**

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8 39. Plaintiff realleges and incorporates herein by reference, as though fully set forth
9 herein, all of the paragraphs above.

10
11 40. Defendants GREHOUND, DOES 2-50, inclusive, and each of them, owed Plaintiff a
12 duty of care in the hiring, retention, training, supervision and equipping of their employees and/or
13 agents, including the driver of the subject bus, herein referred to as driver DOE 1, and voluntarily and
14 unilaterally placed their passengers, including Plaintiff, in the care of driver DOE 1, whose negligent
15 and reckless conduct during the course and scope of his agency and/or employment with Defendants,
16 GREHOUND and DOES 2-50, was a direct and proximate cause of Plaintiff's harm, as alleged
17 herein.

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20 42. Plaintiff is informed and believes, and thereupon alleges that, one or more of
21 Defendants GREYHOUND's and DOES 2-50's employees, and/or agents, including, but not limited
22 to, driver DOE 1, was unfit or incompetent to provide for the safe transportation of Plaintiff,
23 including but not limited to, effective operation of the subject bus, schedule 6848-1, passenger
24 screening, and the safe transportation of passengers traveling the GREYHOUND line on a fixed route
25 from Los Angeles to the Bay Area on February 3, 2020.

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1 43. Defendants named herein, and each of them, knew or should have known that these
2 employees and/or agents, were unfit or incompetent by reason of inadequate training, supervising,
3 support or equipment to perform the responsibilities imposed upon them by the Defendants named
4 herein.

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7 44. Having knowledge of these conditions from which it is reasonably foreseeable that an
8 assault on passengers, including Plaintiff, may and likely would occur, and having the ability to
9 prevent such events that cause loss, damage and/or injury, Defendants, and each of them, by virtue of
10 their negligence in hiring, training, supervising, support and/or equipment, failed to exercise any care,
11 let alone the utmost care required of common carriers like Defendants named herein, in transporting
12 members of the general public. Upon witnessing the assailant's mentally unstable and/or intoxicated
13 condition, as well as his erratic and menacing conduct, driver DOE 1, being untrained, inexperienced,
14 unsupervised, unsupported and ill-equipped as Defendants, and each of them, knew that he was, did
15 nothing to prevent the harm that reasonably could and should have been anticipated, both from past
16 history in their bus transportation operation from the assailant's own behavior before boarding the bus
17 and prior to the assault while he was on the bus. Even after the assailant fired several rounds toward
18 passengers, including Plaintiff, driver DOE 1 remained recklessly and negligently unaware of what
19 was occurring and continued driving the subject bus as if nothing had happened, believing the
20 gunshot noise from within the bus was actually mechanical noise from the engine.
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24 45. As a direct and proximate result of the negligence, recklessness, carelessness, and
25 other wrongdoing of Defendants, and each of them, in hiring, equipping, supervising, supporting,
26 managing and/or training their agents and/or employees, including driver DOE 1, Plaintiff has
27 suffered and will continue to suffer severe mental anguish, humiliation, pain, severe emotional
28 distress and physical distress requiring care and treatment as alleged herein. As a direct and

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1 proximate cause of said negligence, Plaintiff has also lost earnings in an amount according to proof,
2 as alleged herein. The amount and value of the general and special damages suffered by Plaintiff as a
3 proximate result of the wrongful misconduct of the Defendants referred to herein, exceed the
4 jurisdictional minimum of this Court.
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7 **PRAYER FOR RELIEF**

8 WHEREFORE, Plaintiff prays for judgment against Defendants, and each of them, as follows:

- 9 1. For general damages according to proof;
10 2. For past and future medical and/or therapy expenses according to proof;
11 3. For lost earnings and earning capacity, past and future, in an amount to be proven;
12 4. For pre-judgment interest;
13 5. For interest on all economic damages as provided by law from the date of the incident
14 to the date of judgment;
15 6. For costs of suit incurred; and
16 7. For such other and further relief as this court may deem just and proper.
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19 **DEMAND FOR JURY TRIAL**

20 Plaintiff hereby requests a trial by jury.

21 DATED: February 2, 2021

PARKER · STANBURY LLP

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23 BY: *J. Luis Garcia*

J. LUIS GARCIA, ESQ.

24 Attorneys for Plaintiff,
25 CHRISTINA SCOTT
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