

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

SUPERIOR COURT OF WASHINGTON FOR PIERCE COUNTY

JEREMIAH L. ARMENTA-JOHNSON,  
individually

Plaintiff,

vs.

BRITANIA A. HANSON and JOHN DOE  
HANSON, individually and the marital  
community composed thereof,

Defendants.

NO.

COMPLAINT FOR DAMAGES

COMES NOW Plaintiffs against the above-named Defendants, and state and allege as follows:

**I. PARTIES & JURISDICTION**

1.1 Plaintiff Jeremiah Armenta-Johnson is now, and was at all relevant times hereinafter alleged, a resident of King County, State of Washington.

1.2 Defendants Britania Hanson and John Doe Hanson are believed to be, and were at all relevant times hereinafter alleged, residents of Thurston County, State of

1 Washington. If this Defendant is married then the acts and omissions hereinafter described  
2 were for and on behalf of this Defendant's marital community.

3 1.3 All acts and omissions alleged to have occurred herein took place in Pierce  
4 County, State of Washington. Pierce County is therefore a proper venue for this action.  
5

## 6 II. FACTS

7 2.1 On or about February 24, 2012, Defendant Britania Hanson was operating a  
8 motor vehicle on 114<sup>th</sup> St S. in Pierce County, Washington.  
9

10 2.2 Dean Walton was traveling northbound on SR 7 approaching the 114th Street  
11 South intersection in Pierce County, Washington.

12 2.3 Plaintiff Jeremiah Armenta-Johnson was a passenger in Dean Walton's  
13 vehicle.  
14

15 2.4 Defendant Britania Hanson made a left turn in front of Dean Walton from  
16 114th St South attempting to travel southbound on SR 7.

17 2.5 Dean Walton was unable to slow his vehicle and collided with Defendant  
18 Britania Hanson's vehicle.

19 2.6 Defendant Britania Hanson's vehicle spun out of control and collided with a  
20 third vehicle driven by Virgie Armstrong.  
21

22 2.7 Dean Walton's vehicle also spun out of control and collided with a vehicle  
23 driven by Manuel Zuniga.

24 2.8 Plaintiff Jeremiah Armenta-Johnson suffered bodily injuries and sustained  
25 significant damages as a result of the collisions.  
26

1  
2 **III. CAUSE OF ACTION—NEGLIGENCE**

3 3.1 Plaintiff re-alleges the allegations contained in paragraphs 1.1 through 2.8,  
4 and incorporate them as though fully set forth herein.

5 3.2 Defendant Britania Hanson owed plaintiff a duty of care and a duty to act  
6 reasonably.

7 3.3 Defendant Britania Hanson breached her duty of care and her duty to act  
8 reasonably by, among other things, performing by failing to yield to the right-of-way to Dean  
9 Walton's vehicle.  
10

11 3.4 Defendant Britania Hanson breached her duty of care and her duty to act  
12 reasonably by, among other things, operating her vehicle in an unsafe manner that caused a  
13 collision with Dean Walton's vehicle.  
14

15 3.5 As a result of the Defendant's negligent acts and/or omissions, Plaintiff was  
16 injured, suffered, and continue to suffer, physical disability and pain, emotional trauma,  
17 medical expenses, loss of earnings and earning capacity, and other damages.  
18

19 WHEREFORE, Plaintiff prays for judgment against the Defendants, jointly and  
20 severally, as follows:  
21

22 1. For all damages sustained by Plaintiff in an amount proven at trial, including  
23 past and future medical expenses and other health care expenses, pain and suffering, both  
24 mental and physical, past and future permanent partial disability and disfigurement, loss of  
25  
26

1 enjoyment of life, damages to property, past and future special damages, loss of consortium  
2 and other damages;

3 2. Interest calculated at the maximum amount allowable by law, including pre-  
4 and post-judgment interest;

5 3. A reasonable attorney's fee as allowed by law;

6 4. Costs and disbursements pursuant to statute; and

7 5. Other and further relief as this Court may deem just and equitable.

8 Dated this 2<sup>nd</sup> day of December, 2014.

9  
10 **DAVIS LAW GROUP, P.S.**

11 /s/ GREGORY S. COLBURN

12 By: Christopher M. Davis, WSBA No. 23234

13 By: Gregory S. Colburn, WSBA No. 41236

14 Attorneys for Plaintiff

15 Davis Law Group, P.S.

16 2101 Fourth Ave., Ste. 1030

17 Seattle, WA 98121

18 Tel: (206) 727-4000

19 Fax: (206) 727-4001

20 Email: chris@davislawgroupseattle.com

21 Email: greg@davislawgroupseattle.com