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SUPERIOR COURT OF WASHINGTON
FOR CLARK COUNTY

CAROLE OLSON,

Plaintiff,

vs.

LAURA KAUFMAN,

Defendant.

Case No. **15-2-02501-9**
COMPLAINT FOR DAMAGES

Plaintiff, Carole Olson, alleges as follows:

I. INTRODUCTION

- 1.1 Carole Olson lives in Vancouver, Washington, in Clark County.
- 1.2 Upon information and belief, defendant Laura Kaufman lives in Vancouver, Washington, in Clark County.

II. JURISDICTION AND VENUE

2.1 The Superior Court of Clark County, State of Washington, has jurisdiction over the parties and the subject matter of this litigation. The amount in controversy is in excess of \$50,000, and the automobile crash giving rise to this lawsuit occurred in Clark County, Washington.

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1 2.2 Pursuant to RCW 4.12.020(3), a plaintiff may bring an action for personal injury
2 in the county in which the cause of action arose. Venue is proper in Clark County because
3 Ms. Kaufman's negligent conduct, which resulted in injuries to Ms. Olson, occurred in Clark
4 County, Washington.

5 III. FACTS

6 3.1 On September 17, 2012, Ms. Olson was driving her vehicle in Vancouver,
7 Washington, which is in Clark County. On September 17, 2012, Ms. Kaufman was also
8 driving a vehicle in Vancouver. Ms. Olson was rear-ended by Ms. Kaufman between NE
9 164th and NE 192nd streets.

10 3.2 As a direct and proximate result of the automobile crash on September 17, Ms.
11 Olson suffered bodily injuries, some or all of which may be permanent.

12 IV. CLAIM FOR NEGLIGENCE

13 4.1 Ms. Olson realleges, incorporates, and adopts by reference all paragraphs above.

14 4.2 As a user of public roads and a driver of a motor vehicle, Ms. Kaufman has a duty
15 to exercise reasonable care in the operation of her vehicle.

16 4.3 Ms. Kaufman breached her duty to use reasonable care in one or more ways:

- 17 a) In failing to keep a proper distance from Ms. Olson's vehicle;
18 b) In failing to keep a proper lookout;
19 c) In traveling at a rate of speed greater than was reasonable and prudent under the
20 circumstances.
21 d) In failing to maintain proper control over her vehicle;
22 e) In failing to steer properly or otherwise avoid colliding with Ms. Olson's vehicle;
23 and
24 f) In failing to slow or stop her vehicle in time to avoid crashing into Ms. Olson's
25 vehicle.

26 4.4 As a direct and proximate result of Ms. Kaufman's negligence, Ms. Olson

1 sustained personal injuries, some or all of which may be permanent, including but not limited
2 to:

- 3 a) Neck and back injuries, resulting in pain;
- 4 b) Shoulder injuries, resulting in bilateral shoulder pain;
- 5 d) Numbness and tingling down her left side, including down her arm, hand, and into
6 her fingers and thumb; and
- 7 e) A rotator cuff tear.

8 4.5 As a direct and proximate result of Ms. Kaufman's negligence, Ms. Olson has
9 suffered pain, concern for her physical well-being, reduced range of motion, loss of sleep,
10 inconvenience, and interference with her normal and usual activities.

11 4.6 As a direct and proximate result of Ms. Kaufman's negligence, Ms. Olson's
12 vehicle sustained damage and necessitated repairs.

13 4.7 As a direct and proximate result of Ms. Kaufman's negligence, Ms. Olson
14 necessitated medical care.

15 WHEREFORE, Ms. Olson prays for judgment against Ms. Kaufman as follows:

- 16 a) An award of prejudgment interest on all medical and out-of-pocket expenses;
- 17 b) Ms. Olson's out-of-pocket property damage and other out-of-pocket expenses in an
18 amount to be proven at trial;
- 19 c) Past medical expenses in an amount to be proven at trial;
- 20 d) Future medical expenses in an amount to be proven at trial;
- 21 e) General damages in an amount to be proven at trial;
- 22 f) Costs and attorney fees as allowable under law;

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1 g) Post-judgment interest as allowable under law; and

2 h) For such other and further relief as the Court may deem just and proper.

3 DATED: September 9, 2015.

4 OLSON BROOKSBY PC

5 By: 

6 Kristin Olson, WSB 48452

7 E-mail: kolson@olsonbrooksby.com

8 Telephone: 503-740-7608

9 Attorneys for Plaintiff