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CONFORMED COPY  
ORIGINAL FILED  
Superior Court of California  
County of Los Angeles

JUL 07 2017

Sherri R. Cooper, Registrar/Clerk  
By: *M. Sale* Deputy  
Moses Sale

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES**

TORI SHELDON DREW  
Plaintiff,  
v.  
WESLEY MICHAEL VELKOV and  
DOES 1 through 50, inclusive,  
Defendant(s).

CASE NO.: **BC 667910**

**COMPLAINT FOR:**

- 1. MOTOR VEHICLE NEGLIGENCE**
- 2. GENERAL NEGLIGENCE**

**DEMAND FOR JURY TRIAL**

By Fax

1 COMES NOW the Plaintiff, TORI SHELDON DREW (hereinafter referred to as  
2 “Plaintiff” or “DREW”), who alleges and complains against Defendants, and each and all of  
3 them, as follows:

4 **PRELIMINARY ALLEGATIONS**

5 1. Plaintiff, TORI SHELDON DREW is, and at all times relevant herein was, an  
6 individual residing in British Colombia, Canada.

7 2. Plaintiff is informed and believes and based thereon alleges that Defendant,  
8 WESLEY MICHAEL VELKOV (“VELKOV”) is, and at all times relevant herein was, an  
9 individual residing in the State of California, County of Los Angeles.

10 3. Defendant VELKOV is an adult male. VELKOV was the driver of one of the two  
11 vehicles involved in a collision on or about August 6, 2016, which injured Plaintiff DREW.

12 4. The true names and capacities, whether individual, corporate, associate, or  
13 otherwise, of the defendants named herein as DOES 1 through 50 (hereinafter “DOE  
14 Defendants”), inclusive, are unknown to Plaintiff, who therefore sues said DOE Defendants under  
15 such fictitious names under Section 474 of the Code of Civil Procedure. Plaintiff will amend this  
16 complaint to allege their true names and capacities when the same has been ascertained. Plaintiff  
17 is informed and believes, and therefore alleges, that each of the fictitiously named DOE  
18 Defendants is responsible in some manner for the occurrences hereinafter alleged, and that  
19 Plaintiff’s damages as hereinafter set forth were legally caused by said DOE Defendants.  
20 Defendants and DOE Defendants are hereinafter collectively referred to as the “Defendants.”

21 **JURISDICTION AND VENUE**

22 5. The Court has jurisdiction over this action because Defendant VELKOV resides in  
23 the State of California, County of Los Angeles.

24 6. Venue is proper in this Court because Defendant VELKOV is subject to this  
25 Court’s personal jurisdiction as a resident of the County of Los Angeles and because the subject  
26 collision occurred in the County of Los Angeles.

**FACTUAL ALLEGATIONS**

1  
2 7. This personal injury action arises from a collision between an automobile and a  
3 motorcycle that occurred on or about August 6, 2016 (the "COLLISION").

4 8. VELKOV was the driver of the automobile involved in the COLLISION.

5 9. Plaintiff was a passenger on the motorcycle involved in the COLLISION.

6 10. The COLLISION occurred through no fault of Plaintiff, but rather, was caused  
7 entirely by Defendant VELKOV and DOES 1-50.

8 11. Plaintiff is informed and believes and based thereon alleges that, at all relevant  
9 times, VELKOV was distracted, disabled and/or impaired in such a manner and to such an extent  
10 that VELKOV could not safely operate an automobile.

11 12. Plaintiff is informed and believes and based thereon alleges that, at all relevant  
12 times, VELKOV knew of such distraction, disability and/or impairment and was aware of the  
13 probable dangerous consequences of driving an automobile, but disregarded those dangers and  
14 chose to drive nonetheless, in conscious disregard of the safety of Plaintiff and others.

15 13. As a result of VELKOV'S actions, Plaintiff suffered serious and permanent  
16 injuries and damages that exceed the jurisdictional limits of this Court.

**FIRST CAUSE OF ACTION**

**(Motor Vehicle Negligence)**

**Against VELKOV and DOES 1-25**

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20 14. Plaintiff hereby re-alleges and incorporates herein by reference each and every  
21 allegation contained in the previous paragraphs as though fully set forth herein.

22 15. Defendants owed Plaintiff a duty of reasonable/due care as well as statutory duties  
23 established by the California Vehicle Code.

24 16. Defendants breached their duty of reasonable due care as well as one or more of  
25 the duties established by the California Vehicle Code, including but not limited to, Vehicle Code  
26 section 21801(a). Such conduct constitutes *negligence per se*.





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**JURY TRIAL DEMANDED**

Plaintiff demands a trial by jury.

Dated: July 7, 2017

DAILY ALJIAN LLP

By:   
Justin E. Daily  
Attorneys for Plaintiff  
TORI SHELDON DREW