

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
23CV026335-910

ALICIA PAXSON,
Administratrix of the Estate of Philip Paxson,
Deceased, and in her own right,

Plaintiff,

v.

GOOGLE LLC d/b/a Google, ALPHABET,
INC., d/b/a Alphabet, TARDE, LLC d/b/a
Tarde, JAMES TARLTON, individually, and
HINCKLEY GAUVAIN, LLC,

Defendants.

}
}
}
}
}
}
}
}
}
}
}
}
}

COMPLAINT

Plaintiff, Alicia Paxson, by and through the undersigned counsel, hereby files this civil action complaint against the above-named defendants and demands a jury trial. In support thereof, she states as follows:

1. On the night of September 30, 2022, Philip Paxson, a devoted husband, father and proud United States Navy Veteran, died tragically while driving home from his daughter’s ninth birthday party, when he drove off of an unmarked, unbarricaded collapsed bridge in Hickory, North Carolina while following GPS directions.



Photograph of the subject bridge taken after the incident in daylight

2. Mr. Paxson was unaware that the bridge had previously collapsed, and instead was under the reasonable belief that the road and bridge was safe to drive on.

3. At that time, and for years prior, Google Maps directed drivers to cross over the collapsed bridge when users requested directions through its GPS services.

4. Community members notified Google of the collapsed bridge and the danger its GPS services posed to those unfamiliar with the area.

5. On the dark and rainy night of September 30, 2022, Mr. Paxson suffered the fate that many community residents feared: his vehicle drove off of the unguarded edge of the collapsed bridge and he was injured and killed.

6. As discussed herein, Philip Paxson leaves behind his loving wife, Alicia, and his two young daughters, A.P., age 9, and J.P., age 7.



Philip Paxson with his wife, Alicia Paxson

