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6	Attorneys for: Plaintiff Lindsay Molander;			
7	Plaintiff Parker Austin, by and through GAL Lauren Bryan; Cross-Complainant Estate of Micah Lee			
8	Cross-Comprement Estate of Wrean Lee			
9	SUPERIOR COURT OF THE STATE OF CALIFORNIA			
10	FOR THE COUNT	Y OF RIVERSIDE		
11	LINDSAY MOLANDER, an individual; and	Case No. RIC2002469		
12 13	PARKER AUSTIN, a minor, by and through his GUARDIAN AD LITEM, LAUREN BRYAN,	Assigned For All Purposes To:		
13	Plaintiffs,	Hon. Judge Harold W. Hopp Dept. 10		
15	VS.	THIRD AMENDED COMPLAINT FOR		
16	TESLA, INC., dba TESLA MOTORS, INC.;	DAMAGES FOR WRONGFUL DEATH:		
17	ESTATE OF MICAH LEE; and DOES 1 to 50, inclusive,	1. STRICT LIABILTY –		
18	Defendants.	MANUFACTURING DEFECT;		
19		2. STRICT LIABLITY – DESIGN DEFECT;		
20	AND ALL RELATED CROSS ACTIONS.			
21		3. NEGLIGENCE;		
22		4. NEGLIGENCE – FAILURE TO RECALL.		
23				
24		UNLIMITED CIVIL ACTION		
25		Complaint filed: June 26, 2020 Trial Setting Conf.: October 17, 2022		
26		Trial Date: None Set		
27	– JURY TRIAL	DEMANDED –		
28				
		1		
	THIRD AMEND	ED COMPLAINT		

COMES NOW Plaintiff Lindsay Molander, individually; Plaintiff Parker Austin, by and through his Guardian Ad Litem, Lauren Bryan; and Cross-Complainant Estate of Micah Lee (collectively and hereinafter "Plaintiffs/Cross-Complainant"), for the Plaintiffs/Cross-Complainant' Third Amended Complaint against Defendants Tesla, Inc., dba Tesla Motors, Inc.; Does 1 to 50, inclusive, and Roes 1 to 10, inclusive (collectively and hereinafter "Defendants"), allege as follows:

THE PARTIES

1. At all times mentioned in this Complaint, Plaintiff Lindsay Molander is, and at all relevant times was, an individual residing in Riverside County in the State of California.

2. Plaintiff Parker Austin is a minor represented by and through Guardian ad Litem Lauren Bryan. At all times mentioned in this Complaint, Plaintiff Parker Austin is, and at all relevant times was, an individual residing in Riverside County in the State of California.

3. Micah Lee was the driver in a vehicle involved in a single vehicle collision in Interstate 215 near McCall Boulevard in Menifee, CA. Mr. Lee suffered fatal injuries as a result of the collision. His Estate brings this lawsuit against the manufacturer, distributor, and seller of the vehicle he was in for Strict Product Liability and Negligence.

4. At all times mentioned in this Complaint, Cross-Complainant Estate of Micah Lee is, and at all relevant times was, an individual residing in Riverside County in the State of California.

5. Plaintiffs/Cross-Complainant are informed and understand that Defendant Tesla, Inc., dba Tesla Motors, Inc., was and is a Delaware corporation with its principal place of business in Palo Alto, CA. At the time this lawsuit and its Amended Complaints and Cross-Complaints were filed, these Tesla entities were citizens of California (herein all Tesla entities are referred to as "Tesla"). Tesla has filed an answer to Plaintiffs' previous Second Amended Complaint on April 6, 2021, and to Cross-

Complainant's previous Cross-Complaint on December 15, 2021. At all times mentioned herein, Tesla
 was engaged in the business of manufacturing, fabricating, designing, assembling, distributing, selling,
 inspecting, servicing, repairing, marketing, warranting, leasing, renting, retailing, wholesaling, and
 advertising consumer automobiles. Its products include the Roadster, the Model S sedan, the Model 3
 sedan, the Model Y crossover SUV, and the Model X crossover SUV.

6. Plaintiffs/Cross-Complainant are unaware of the true names of Does 1 through 50 and therefore sues them by such fictitious names and will ask for leave of Court to insert their true names when such have been ascertained.

7. Plaintiffs/Cross-Complainant are unaware of the true names of Roes 1 through 10 and therefore sues them by such fictitious names and will ask for leave of Court to insert their true names when such have been ascertained.

JURISDICTION

8. This Court has personal jurisdiction over Plaintiff Lindsay Molander as Ms. Molander consents to such jurisdiction.

9. This Court has personal jurisdiction over Plaintiff Parker Austin as Mr. Austin consents to such jurisdiction.

10.This Court has personal jurisdiction over Cross-Complainant Estate of Micah Lee as theEstate of Micah Lee consents to such jurisdiction.

11. This Court has personal jurisdiction over Defendant Tesla because it is engaged in the
sale of consumer vehicles throughout the state of California, thus providing the Court with general
jurisdiction.

THIRD AMENDED COMPLAINT

12. This Court has jurisdiction in this matter pursuant to Code of Civil Procedure section 410.10 because the accident and/or injury occurred within Riverside County, State of California.

VENUE

13. Venue in this county is proper under Cal. Civ. Proc. Code § 395(a). The injuries giving rise to this Complaint occurred in the County of Riverside.

STATEMENT OF OPERATIVE FACTS

14. Plaintiffs/Cross-Complainant repeat every allegation contained in the paragraphs above and incorporates such allegations herein by reference.

15. This case is about the unnecessary death of Micah Lee and the unnecessary injuries to Lindsay Molander and Parker Austin. Tragically, this could have been prevented. Micah Lee, Lindsay Molander, and Parker Austin were seriously injured, with Micah Lee losing his life, because of the reckless and negligent behavior of Defendant Tesla in designing and manufacturing the 2019 Tesla Model 3. This case is being brought by Plaintiffs/Cross-Complainant against the entity whose actions and inactions caused Micah Lee's premature death and Lindsay Molander and Parker Austin's serious injuries.

16. Defendant Tesla is a large manufacturer and distributor of consumer automobiles, distributing millions of vehicles throughout the United States. One of the vehicles that has been long massed distributed by Tesla is the 2019 Tesla Model 3.

17. On or about May 3, 2019, Decedent Micah Lee purchased a 2019 Tesla Model 3 (VIN:5YJ3E1EB9KF205710) from Tesla. Plaintiff's motivation for purchasing the vehicle was to obtain a

safely designed and manufactured vehicle. At the time of distributing the vehicle, Tesla repeatedly published advertisements to consumers that the 2019 Tesla Model 3 was properly designed and skillfully crafted.

18. On June 29, 2019, shortly after 10:00 p.m., Decedent Micah Lee was the driver of the subject 2019 Tesla Model 3 and was traveling approximately 65 miles per hour southbound along Interstate 215 with Lindsay Molander in the front passenger seat and Parker Austin in the rear driver's side seat.

19. Decedent Micah Lee was utilizing the Tesla Model 3's Autopilot and/or Active Safety features at the time. There were no obstructions in the road. However, shortly after passing the McCall Boulevard overpass, suddenly, and without warning, the Tesla Model 3's Autopilot and/or Active Safety features caused the subject vehicle to veer sharply to the right, where it left the pavement, and impacted a palm tree at a high rate of speed. The subject vehicle burst into flames. Micah Lee was killed in the collision. Lindsay Molander and Parker Austin were seriously injured in the collision.

20. Prior to impacting the palm tree, Decedent Micah Lee attempted to, but could not, regain control of the Tesla Model 3 because the Autopilot and/or Active Safety features would not allow Decedent Lee to regain control of the Tesla Model 3.

21. To the surprise and horror of Decedent Micah Lee, the Tesla Model 3's Autopilot and/or Active Safety features failed while he was driving on the freeway, resulting in the impact event whereby Decedent Micah Lee suffered gruesome and ultimately fatal injuries. Had the vehicle's Autopilot and/or Active Safety features operated properly, Decedent Micah Lee's death would have been avoided.

22. Additionally, to the surprise and horror of Lindsay Molander, the Tesla Model 3's Autopilot and/or Active Safety features failed while she was a passenger on the freeway, resulting in

the impact event whereby Lindsay Molander suffered severe injuries. Had the vehicle's Autopilot and/or Active Safety features operated properly, Lindsay Molander's injuries would have been significantly less severe.

23. Additionally, to the surprise and horror of Parker Austin, the Tesla Model 3's Autopilot and/or Active Safety features failed while he was a passenger on the freeway, resulting in the impact event whereby Parker Austin suffered severe injuries. Had the vehicle's Autopilot and/or Active Safety features operated properly, Parker Austin's injuries would have been significantly less severe.

24. The accident sequence as described above is hereafter referred to as the "subject accident."

25. Plaintiffs/Cross-Complainant are informed and believe and thereon allege that at no time after the purchase of the Tesla Model 3 did any person alter, modify, or change any aspect or component of the vehicle's design or manufacture.

26. Plaintiffs/Cross-Complainant are informed and believe and thereon allege that immediately before the fatal impact, the Tesla Model 3 was being operated using one or more of the vehicle's Autopilot and/or Active Safety features as defined on Tesla's website on May 31, 2019, at the following link: <u>https://web.archive.org/web/20190531002918/https://www.tesla.com/support/autopilot</u>.

27. Plaintiffs/Cross-Complainant are informed, believe, and thereon allege that defects in the Tesla Model 3 as set forth herein caused and/or contributed to causing the subject incident referenced above.

28. Defendant Tesla's Model 3's Autopilot and/or Active Safety features were defective and not ready for market, yet Tesla and its CEO Elon Musk advertised, presented, and maintained it as if it was.

29. Defendant Tesla knew, or should have known, that the 2019 Tesla Model 3 was defective and dangerous.

30. Defendant Tesla knew, or should have known, that numerous people had been injured or killed by Tesla vehicles.

31. Defendant Tesla knew, or should have known, that there were safety issues with the Autopilot and/or Active Safety features in the Tesla Model 3 that could cause it to fail and cause the vehicle to lose control.

32. Despite knowing the dangerous propensities of the Tesla Model 3's Autopilot and/or Active Safety features, Defendant Tesla nevertheless authorized and ratified the sale of the Tesla Model 3s to the public without sufficient warning of the Autopilot and/or Active Safety features' propensity to fail.

33. Defendant Tesla designed, engineered, developed, manufactured, fabricated, assembled, equipped, tested or failed to test, inspected or failed to inspect, repaired, retrofit or failed to retrofit, failed to recall, labeled, advertised, promoted, marketed, supplied, distributed, wholesaled, and sold the 2019 Tesla Model 3, a product which Defendant Tesla knew, or should have known, to be dangerous and unsafe for the purpose for which Tesla intended it to be used, namely, as a passenger vehicle.

34. Prior to and at the time that Defendant Tesla sold the 2019 Tesla Model 3 to Decedent Micah Lee, and prior to the time that said product was used, Defendant Tesla knew, or should have known, that the Tesla Model 3, and its component parts, was defectively designed and manufactured, that it had extremely dangerous properties and defects, and that it had defects which would cause serious injuries and damage to users of said product, thereby threatening the life and health of the users. 35. Defendant Tesla knew, or should have known, that the defects in the Tesla Model 3's
 Autopilot and/or Active Safety features had caused serious injuries and damage to other users of these
 vehicles.

36. Defendant Tesla, despite the actual knowledge described hereinabove, intentionally suppressed the aforementioned user complaints, criticisms, and other information to keep their knowledge from the general public, including Plaintiffs/Cross-Complainant, and failed to take any steps to warn Plaintiffs/Cross-Complainant, or other members of the general public, of the dangers of using the 2019 Tesla Model 3. Defendant Tesla authorized and ratified the suppression of this information from the public.

37. Plaintiffs/Cross-Complainant did not know, nor reasonably could have known, that the vehicle's Autopilot and/or Active Safety features would fail during the incident. Had Plaintiffs/Cross-Complainant known about the vehicle's defective Autopilot and/or Active Safety features at the time of purchase, Plaintiffs/Cross-Complainant would have either demanded its immediate repair or never would never have purchased the vehicle at all. In either event, Plaintiffs/Cross-Complainant never would have been a driver or passenger in the Tesla Model 3.

FIRST CAUSE OF ACTION

STRICT LIABILITY – MANUFACTURING DEFECT (Plaintiffs LINDSAY MOLANDER, PARKER AUSTIN, and Cross-Complainant ESTATE OF MICAH LEE Against Defendant TESLA, INC.)

38. Plaintiffs/Cross-Complainant repeat every allegation contained in the paragraphs above and incorporates such allegations herein by reference.

39. Defendant Tesla manufactured, designed, distributed, assembled, packaged, tested, fabricated, analyzed, inspected, merchandised, marketed, labeled, advertised, promoted, sold, supplied,

leased, rented, repaired, and adjusted the 2019 Tesla Model 3 purchased and operated by Decedent Micah Lee.

40. The 2019 Tesla Model 3 being operated by Decedent Micah Lee contained a manufacturing defect when it left Tesla's possession, including, not limited to, the following:

- a. Defective Autopilot and/or Active Safety features which failed due to negligent design, manufacture, assembly, testing, and marketing. In addition, the Autopilot and/or Active Safety features lacked proper sensor design, lacked a properly designed central processing unit, algorithms, among other negligence in the design, manufacturing, assembly, testing, and marketing that prevented the Autopilot and/or Active Safety features from operating properly in the subject accident.
- b. A defective and unsafe driver seat and seat back, which failed to perform safely during the described accident sequence, causing Decedent Micah Lee to suffer fatal injuries. At all times prior to their design, manufacture, and sale of the 2019 Tesla Model 3, Defendant Tesla knew and were well aware, from prior accidents, lawsuits, and warranty claims, and from mandatory pre-production fuel system integrity tests required by law to be conducted under Federal Motor Vehicle Safety Standard ("FMVSS"), as well as a multitude of published research from many decades prior to the design and manufacturer of the subject vehicle, that the 2019 Tesla Model 3's design was too weak and was incapable of withstanding foreseeable, impacts at speeds of 60-70 miles per hour, without causing fatal injuries to properly-restrained occupants. Despite the availability of simple methods to correct the defects, as recommended on information and belief by Defendant Tesla's automotive engineers including, but not limited to, strengthened seat back frames, stronger recliners, dual recliners, and belt-integrated seats, fire protection remediation and in spite of the known risk of serious and fatal head and spinal injuries and occupant ejection, Defendant Tesla chose to ignore the inherent safety problem, and took no action

to prevent such debilitating injuries and deaths, because of concern solely over cost penalties, including increased production costs and reduced profits.

c. A defective and unsafe restraint system, which Defendant Tesla knew from prior accidents, incidents, claims, lawsuits, warranty claims, other media publications, from their own FMVSS tests, and from a multitude of published research over many decades would predictably fail to restrain an occupant in the subject vehicle in the event of a moderate front impact event, following the known and foreseeable failure of the vehicle's safety systems which, in this case, failed to restrain Decedent Micah Lee and further failed to prevent an uncontrolled fire.

d. Inadequate vehicle structures with inadequate crash worthiness which Defendant Tesla knew from prior accidents, incidents, claims, lawsuits, warranty claims, other media publications, from their own FMVSS tests, and from a multitude of public research over decades would fail and intrude into the passenger compartment or occupant "zone of safety" causing injury in the event of even a modest impact. The structure of the vehicle is meant to act as an energy absorption zone and should be designed to crush and absorb as much energy as possible while maintaining the integrity of the occupant compartment. In this case, the vehicle structures, including the battery, hood, radiator, and engine, were pushed rearward contributing to Decedent Micah Lee's fatal injuries.

e. Inadequate and/or lack of any warnings regarding the above defects.

41. Decedent Micah Lee was killed by the 2019 Tesla Model 3. Plaintiffs Lindsay Molander and Parker Austin were harmed by the 2019 Tesla Model 3.

42. The 2019 Tesla Model 3's defect was a substantial factor in causing Lindsay Molander,
Parker Austin, and Micah Lee's harm.

1	43. As a direct and proximate cause of the conduct of Tesla, Lindsay Molander, Parker		
2	Austin, and the Estate of Micah Lee have sustained damages as reflected in the Statement of Damages		
3	served herewith, and in an amount to be proven at trial, but which is in excess of the minimum		
4	jurisdictional limit of this Court.		
5			
6	44. Defendant Tesla's conduct was fraudulent, malicious and oppressive, justifying an		
7	award of punitive damages pursuant to Cal. Civ. Code § 3294.		
8			
9	SECOND CAUSE OF ACTION		
10	STRICT LIABILITY – DESIGN DEFECT		
11	(Plaintiffs LINDSAY MOLANDER, PARKER AUSTIN, and Cross-Complainant ESTATE OF		
12	MICAH LEE Against Defendant TESLA, INC.)		
13			
14	45. Plaintiffs/Cross-Complainant repeat every allegation contained in the paragraphs above		
15	and incorporates such allegations herein by reference.		
16			
17	46. Defendant Tesla designed, manufactured, distributed, assembled, packaged, tested,		
18	fabricated, analyzed, inspected, merchandised, marketed, labeled, advertised, promoted, sold, supplied,		
19	leased, rented, repaired, and adjusted the 2019 Tesla Model 3 purchased and operated by Decedent		
20	Micah Lee.		
21			
22	47. The 2019 Tesla Model 3 being operated by Estate of Micah Lee contained a design		
23	defect in the following respects:		
24			
25	a. It did not perform as safely as an ordinary consumer would have expected it to		
26	perform when used or misused in an intended or reasonably foreseeable way.		
27			
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	11		
	THIRD AMENDED COMPLAINT		

1	b. The benefits of the vehicle's design did not outweigh the risks of the design,	
2	when considering the gravity of the potential harm resulting from the use of the	
3	vehicle, the likelihood that this harm would occur, the feasibility of an alternative	
4	safer design at the time of manufacture, the cost of an alternative design, and the	
5	disadvantages of an alternative design.	
6		
7	48. Decedent Micah Lee was killed by the 2019 Tesla Model 3. Plaintiffs Lindsay Molander	
8	and Parker Austin were harmed by the 2019 Tesla Model 3.	
9		
10	49. The 2019 Tesla Model 3's defect was a substantial factor in causing Lindsay Molander,	
11	Parker Austin, and Micah Lee's harm.	
12		
13	50. As a direct and proximate cause of the conduct of Tesla, Lindsay Molander, Parker	
14	Austin, and the Estate of Micah Lee have sustained damages as reflected in the Statement of Damages	
15	served herewith, and in an amount to be proven at trial, but which is in excess of the minimum	
16	jurisdictional limit of this Court.	
17		
18	51. Defendant Tesla's conduct was fraudulent, malicious and oppressive, justifying an	
19	award of punitive damages pursuant to Cal. Civ. Code § 3294.	
20		
21	THIRD CAUSE OF ACTION	
22	NEGLIGENCE	
23	(Plaintiffs LINDSAY MOLANDER, PARKER AUSTIN, and Cross-Complainant ESTATE OF	
24	MICAH LEE Against Defendant TESLA, INC.)	
25		
26	52. Plaintiffs/Cross-Complainant repeat every allegation contained in the paragraphs above	
27	and incorporates such allegations herein by reference.	
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53. Defendant Tesla designed, manufactured, distributed, assembled, packaged, tested, fabricated, analyzed, inspected, merchandised, marketed, labeled, advertised, promoted, sold, supplied, leased, rented, repaired, and adjusted the 2019 Tesla Model 3 purchased and operated by Decedent Micah Lee.

54. Defendant Tesla had a duty to use reasonable due care in the design, manufacture, assembly, packaging, testing, fabricating, analysis, inspection, merchandising, marketing, distributing, labeling, advertising, promotion, sale, supply, lease, rental, warning, selection, inspection, and repair of the 2019 Tesla Model 3 purchased and operated by Decedent Micah Lee.

55. Defendant Tesla knew and/or, in the exercise of reasonable care, should have known that the 2019 Tesla Model 3, and each of its component parts, were not properly designed, manufactured, assembled, packaged, tested, fabricated, analyzed, inspected, merchandised, marketed, distributed labeled, advertised, promoted, sold, supplied, leased, rented, repaired, and selected, and Defendant Tesla provided inadequate warnings for the use and purpose of which it intended in that it was likely to injure the person who used said product.

56. Defendant Tesla was negligent in designing, manufacturing, assembling, packaging, testing, fabricating, analyzing, inspecting, merchandising, marketing, distributing, labeling, advertising, promoting, selling, supplying, leasing, renting, repairing, selecting, and providing inadequate warnings in relation to the 2019 Tesla Model 3, so that the vehicle was a defective and dangerous product, unsafe and not crashworthy for the respective use and purpose for which it was intended when used and driven as recommended or for reasonably foreseeable misuse by members of the public.

57. Decedent Micah Lee was killed by the 2019 Tesla Model 3. Plaintiffs Lindsay Molander and Parker Austin were harmed by the 2019 Tesla Model 3.

1	58.	The aforesaid conduct of Tesla was a substantial factor in causing harm to Lindsay
2	Molander and	d Parker Austin, and substantially contributed to causing the death of Decedent Micah Lee.
3		
4	59.	Defendant Tesla's negligence was a substantial factor in causing Lindsay Molander,
5	Parker Austir	n, and Micah Lee's harm.
6		
7	60.	As a direct and proximate cause of Defendant Tesla's conduct, Lindsay Molander,
8	Parker Austir	n, and Decedent Micah Lee have sustained damages as reflected in the Statement of
9	Damages serv	ved herewith, and in an amount to be proven at trial, but which is in excess of the
10	minimum jur	isdictional limit of this Court.
11		
12	FOURTH CAUSE OF ACTION	
13		NEGLIGENCE – FAILURE TO RECALL
14	(Plaintiffs l	LINDSAY MOLANDER, PARKER AUSTIN, and Cross-Complainant ESTATE OF
15		MICAH LEE Against Defendant TESLA, INC.)
16		
17	61.	Plaintiffs/Cross-Complainant repeat every allegation contained in the paragraphs above
18	and incorporates such allegations herein by reference.	
19		
20	62.	Defendant Tesla designed, engineered, manufactured, tested, assembled, marketed,
21	advertised, ar	nd distributed the 2019 Tesla Model 3 purchased and operated by Decedent Micah Lee.
22		
23	63.	Defendant Tesla knew or reasonably should have known that the 2019 Tesla Model 3
24	was dangerou	as or was likely to be dangerous when used in a reasonably foreseeable manner.
25		
26	64.	Defendant Tesla became aware of this defect after the 2019 Tesla Model 3 was
27	distributed.	
28		
		14
		THIRD AMENDED COMPLAINT

65. Defendant Tesla failed to recall the 2019 Tesla Model 3.

66. A reasonable manufacturer and distributor under the same or similar circumstances would have recalled the 2019 Tesla Model 3.

67. Decedent Micah Lee was killed by the 2019 Tesla Model 3. Plaintiffs Lindsay Molander and Parker Austin were harmed by the 2019 Tesla Model 3.

68. Defendant Tesla's failure to recall the 2019 Tesla Model 3 was a substantial factor in causing Lindsay Molander, Parker Austin, and Micah Lee's harm.

69. As a direct and proximate cause of Defendant Tesla's conduct, Lindsay Molander, Parker Austin, and Decedent Micah Lee have sustained damages as reflected in the Statement of Damages served herewith, and in an amount to be proven at trial, but which is in excess of the minimum jurisdictional limit of this Court.

70. Defendant Tesla's conduct was fraudulent, malicious and oppressive, justifying an award of punitive damages pursuant to Cal. Civ. Code § 3294.

WHEREFORE, Plaintiff Lindsay Molander, Plaintiff Parker Austin, and Cross-Complainant Estate of Micah Lee pray that the Court award the following:

First Cause of Action

- 1. Compensatory damages.
- 2. Punitive damages against Tesla pursuant to Cal. Civ. Code § 3294.

Second Cause of Action

- 1. Compensatory damages.
- 2. Punitive damages against Tesla pursuant to Cal. Civ. Code § 3294.

1	Third Cause of Action
1	Third Cause of Action
2 3	1. Compensatory damages.
3 4	Fourth Cause of Action
5	1. Compensatory damages.
6	
7	All Causes of Action
8	1. Costs of suit herein incurred.
9	2. Interest as provided by law.
10	3. For such other and further relief as the Court may deem just and proper.
11	
12	MLG, APLC
13	Dated: October 17, 2022 By:
14	Jonathan A. Michaels, Esq.
15	Christopher D. Henderson, Esq. Attorneys for:
16	Plaintiff Lindsay Molander, Plaintiff Parker Austin,
17	Cross-Complainant Estate of Micah Lee
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	16 Third Amended Complaint

1	PROOF OF SERVICE
2	STATE OF CALIFORNIA, COUNTY OF ORANGE
3	I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action. My business address is 600 Anton Blvd., Suite 1240, Costa Mesa, CA 92626. On October 17, 2022, I served the foregoing documents described as:
5	
6	THIRD AMENDED COMPLAINT
7	on the interested parties in this action by placing said document in a sealed envelope addressed as follows:
8	Matthew Berard, Esq.
9	Thomas Branigan, Esq.
10	Bryan A. Reynolds, Esq. BOWMAN & BROOKE, LLP
	970 W. 190th Street, Suite 700
11	Torrance, CA 90502
12	Tel: (310) 525-6635
13	Fax: (310) 719-1019 Matthew.Berard@bowmanandbrooke.com
	Thomas.Branigan@bowmandandbrooke.com
14	Bryan.Reynolds@bowmanandbrooke.com
15	Bodara.Williams@bowmanandbrooke.com
16	
17	<u>X</u> ELECTRONIC MAIL: I caused an electronic image of this document to be transmitted to the above-listed counsel.
18	I declare under penalty of perjury under the laws of the State of California that the foregoing is
19	true and correct.
20	Executed on October 17, 2022, in Costa Mesa, California.
21	/s/ Dallas Diogostine
22	Dallas Diogostine
23	
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26	
27	
28	
	THIRD AMENDED COMPLAINT