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12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

13 **COUNTY OF LOS ANGELES**

14 NANCY ISKANDER, individually, and as
 successor-in-interest to decedent Mark
 15 Iskander; KARIM ISKANDER individually,
 and as successor-in-interest to decedent Jacob
 16 Iskander; ZACHARY ISKANDER,
 individually through his Guardian ad Litem,
 17 KARIM ISKANDER,

18 Plaintiff,

19 v.

20 STATE OF CALIFORNIA, DEPARTMENT
 OF TRANSPORTATION OF THE STATE
 21 OF CALIFORNIA (CALTRANS), a public
 entity; CITY OF WESTLAKE VILLAGE, a
 22 public entity; COUNTY OF LOS ANGELES,
 a public entity; and DOES 1-100, Inclusive
 23

24 Defendants.

Case No. **21STCV27916**

COMPLAINT FOR PERSONAL INJURY

1. DANGEROUS CONDITION OF PUBLIC PROPERTY

DEMAND FOR JURY TRIAL

25 COME NOW plaintiffs NANCY ISKANDER and KARIM ISKANDER, both individually
 26 and as successors in interest to Mark and Jacob Iskander, respectively, and ZACHARY
 27 ISKANDER, individually, through his Guardian ad Litem KARIM ISKANDER (collectively
 28

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1 "PLAINTIFFS") for causes of action against defendants STATE OF CALIFORNIA,
2 DEPARTMENT OF TRANSPORTATION OF THE STATE OF CALIFORNIA (CALTRANS), a
3 public entity; CITY OF WESTLAKE VILLAGE, a public entity; COUNTY OF LOS ANGELES,
4 a public entity (collectively, "DEFENDANTS"); and DOES 1 through 100, inclusive, and each of
5 them, and complains and alleges as follows:

6 **GENERAL ALLEGATIONS**

7 1. On September 29, 2020, at approximately 7:10 p.m., Jacob Iskander and Mark
8 Iskander (hereinafter referred to as "Decedents"), were crossing through a marked crosswalk at the
9 intersection of Saddle Mountain Drive and Triunfo Canyon Road in the City of Westlake Village,
10 County of Los Angeles, State of California (hereafter the "SUBJECT INTERSECTION"). As
11 Decedents were heading east on the north side of Saddle Mountain Drive crossing Triunfo Canyon
12 Road in a marked crosswalk, they were struck by a vehicle driving through the intersection and
13 through the crosswalk. Decedents later died from blunt force trauma. This incident shall hereafter
14 be referred to as the "SUBJECT COLLISION."

15 2. A substantial factor in causing the SUBJECT COLLISION was a dangerous
16 condition of public property. As a direct and foreseeable result of the dangerous condition of
17 public property, the SUBJECT COLLISION occurred thereby causing decedents to suffer fatal
18 injuries. As a direct and foreseeable result of the dangerous condition of public property,
19 PLAINTIFFS suffered damages and losses.

20 3. PLAINTIFFS are informed, believe, and thereon allege, that on September 29,
21 2020, unbeknownst to Decedents or PLAINTIFFS at that time, the SUBJECT INTERSECTION
22 where the SUBJECT COLLISION occurred, was defective and contained various dangerous
23 conditions that created a substantial risk of injury to persons using the SUBJECT
24 INTERSECTION with due care and in a manner which was reasonably foreseeable. In particular,
25 the SUBJECT INTERSECTION was in a dangerously defective condition due to various defects
26 including, but not limited to: dangerous design, construction, maintenance, inadequate signage,
27 and failure to account for changed circumstances or citizen complaints. These dangerous
28 conditions were not, nor would have been, reasonably apparent or anticipated by persons

1 exercising due care, such as Decedents. Accordingly, the SUBJECT INTERSECTION constituted
2 a concealed trap for those exercising due care and acting in a reasonably foreseeable manner.

3
4 **THE PARTIES**

5 4. Plaintiff NANCY ISKANDER, at all times herein relevant, is and was a resident of
6 Los Angeles County. She is the biological and lawful mother to decedents Mark and Jacob
7 Iskander. Pursuant to Code of Civil Procedure § 377.11, NANCY ISKANDER is the successor in
8 interest to decedent Mark Iskander. She has executed and has filed herewith a Declaration
9 affirming her status as such under penalty of perjury pursuant to Code of Civil Procedure §377.32.

10 5. Plaintiff KARIM ISKANDER, at all times herein relevant, is and was a resident of
11 Los Angeles County. He is the biological and lawful father to decedents Mark and Jacob
12 Iskander. Pursuant to Code of Civil Procedure § 377.11, KARIM ISKANDER is the successor in
13 interest to decedent Jacob Iskander. He has executed and has filed herewith a Declaration
14 affirming his status as such under penalty of perjury pursuant to Code of Civil Procedure §377.32.

15 6. Plaintiff ZACHARY ISKANDER, at all times herein relevant, is and was a resident
16 of Los Angeles County. He is the biological and lawful brother to decedents Mark and Jacob
17 Iskander. Zachary is a minor child who brings suit through his father, KARIN ISKANDER, as his
18 Guardian Ad Litem.

19 7. Defendant STATE OF CALIFORNIA, DEPARTMENT OF TRANSPORTATION
20 OF THE STATE OF CALIFORNIA, a public entity (hereinafter "CALTRANS"), is, and at all
21 time herein mentioned was, a public entity duly organized and existing under an by virtue of the
22 laws of the State of California and authorized to do, and doing, business in the State of California.

23 8. Defendant CITY OF WESTLAKE VILLAGE, a public entity (hereinafter
24 "CITY"), is, and at all time herein mentioned was, a public entity duly organized and existing
25 under an by virtue of the laws of the State of California and authorized to do, and doing, business
26 in the State of California

27 9. Defendant THE COUNTY OF LOS ANGELES, a public entity (hereinafter
28 "COUNTY"), is, and at all time herein mentioned was, a public entity duly organized and existing

1 under an by virtue of the laws of the State of California and authorized to do, and doing, business
2 in the State of California.

3 10. Defendants CALTRANS, CITY, and COUNTY are public entity defendants, and
4 are herein collectively referred to as "DEFENDANTS."

5 11. PLAINTIFFS are informed, believe, and thereon allege, that at all times mentioned
6 herein, DEFENDANTS, and DOES 1 through 100, inclusive, and each of them, were and are
7 responsible for maintaining, operating, patrolling, servicing, facilitating, owning, building,
8 drafting, engineering, controlling, designing, inspecting, modifying, planning, contracting, and
9 regulating the provisions of the SUBJECT ROADWAY and its adjacent property.

10 12. PLAINTIFFS are informed, believe, and thereon allege, that at all times mentioned
11 herein, DEFENDANTS, and DOES 1 through 100, inclusive, and each of them, were agents,
12 servants, employees, successors in interest, and/or joint venturers of their co-defendants, and were,
13 as such, acting within the course, scope, and authority of sad agency, employment, and/or venture,
14 and that each and every defendant, as aforesaid, when acting as a principal, was negligent in the
15 selection and hiring of each and every other defendant as an agent, servant, employee, successor in
16 interest, and/or joint venturer.

17 13. PLAINTIFFS are informed, believe, and thereon allege, that at all times mentioned
18 herein, DEFENDANTS personnel who PLAINTIFFS contends are responsible for the negligent
19 and reckless acts and omissions as described herein, which PLAINTIFFS contend are the legal and
20 proximate cause of PLAINTIFFS' damages as described herein. PLAINTIFFS will amend this
21 complaint to set forth the same as soon as the identities of the culpable individuals are identified.

22 14. PLAINTIFFS are informed, believe, and thereon allege, that at all times mentioned
23 herein, DEFENDANTS personnel and DOES 1 through 100, inclusive, and each of them, were
24 agents, servants, employees, successors in interest, and/or joint venturers of their co-defendants,
25 and were, as such, acting within the course, scope, and authority of said agency, employment,
26 and/or venture, and that each and every defendant, as foresaid, when acting as a principal, was
27 negligent in the selection and hiring of each and every other defendant as an agent, servant,
28 employee, successor in interest, and/or joint venturer.

1 15. The true names and capacities, whether individual, plural, corporate, partnership,
2 associate, or otherwise, of DOES 1 through 100, inclusive, are unknown to PLAINTIFFS who
3 therefore sues said defendants by such fictitious names. The full extent of the facts linking such
4 fictitiously sued defendants is unknown to PLAINTIFFS. PLAINTIFFS are informed, believe,
5 and thereupon allege, that each of the defendants designated herein as a DOE was, and is,
6 negligent, or in some other actionable manner, responsible for the events and happenings
7 hereinafter referred to, and thereby negligently, or in some other actionable manner, legally and
8 proximately caused the hereinafter described injuries and damages to PLAINTIFFS.
9 PLAINTIFFS will hereafter seek leave of the Court to amend this complaint to show the
10 defendants' true names and capacities after the same have been ascertained.

11
12 **GOVERNMENT CLAIM FILING COMPLIANCE**

13 16. PLAINTIFFS complied with the applicable claims statutes. The SUBJECT
14 COLLISION occurred on September 29, 2020. PLAINTIFFS timely filed their government
15 claims on defendants CITY and COUNTY on January 19, 2021 and defendant CALTRANS on
16 February 2, 2021. Defendant CALTRANS never responded to PLAINTIFFS' timely government
17 claims. Defendant CITY OF WESTLAKE rejected PLAINTIFFS' government claims on
18 February 2, 2021. Defendant COUNTY OF LOS ANGELES rejected PLAINTIFFS' government
19 claims on February 3, 2021. This lawsuit now follows.

20
21 **FIRST CAUSE OF ACTION**

22 **(Dangerous Condition of Public Property by PLAINTIFFS Against Defendants**
23 **CALTRANS, CITY, COUNTY, and DOES 1 through 100, inclusive.)**

24 17. PLAINTIFFS re-allege and incorporate herein by reference each and every
25 allegation and statement contained in the prior paragraphs.

26 18. PLAINTIFFS are informed, believe, and thereon allege, that at all times herein
27 relevant, the SUBJECT INTERSECTION, where the SUBJECT COLLISION occurred, was
28 defective and contained various dangerous conditions pursuant to Government Code sections 835

1 *et. seq.*, that created a substantial risk of injury to persons when such roadway was used with due
2 care and in a manner which was reasonably foreseeable. Various dangerous defects rendered the
3 SUBJECT INTERSECTION a dangerously defective condition, including, but not limited to:

4 a. The SUBJECT INTERSECTION and SUBJECT CROSSWALK were
5 improperly supervised, controlled, contracted, inspected, repaired, maintained, monitored,
6 and worked on with regard to design configurations, geometrics, sight distance, absence of
7 traffic control devices and warning devices, the presence of certain topography, vegetation,
8 shrubbery, appurtenances, physical features, fixtures, on and adjacent to the SUBJECT
9 INTERSECTION and the SUBJECT CROSSWALK, which created a dangerous condition
10 which was not reasonably apparent to even prudent motorists and pedestrians;

11 b. The SUBJECT INTERSECTION lacks any or has insufficient and/or
12 defective warning signs, signals, or other forms of warning to alert drivers or pedestrians;

13 c. The street lights located at the SUBJECT INTERSECTION and/or street
14 lights located on the adjacent property that were necessary to make the SUBJECT
15 INTERSECTION and/or SUBJECT CROSSWALK safe for pedestrian travel were
16 operating in a defective manner or not operating at all thereby preventing motorists from
17 having the ability to see pedestrians traveling at the SUBJECT CROSSWALK;

18 d. The SUBJECT INTERSECTION is improperly, dangerously, and
19 defectively placed, angled, designed, built, drafted, engineered, controlled, inspected,
20 modified, planned, contracted, and regulated;

21 e. The SUBJECT CROSSWALK is improperly, dangerously, and defectively
22 placed, angled, designed, built, drafted, engineered, controlled, inspected, modified,
23 planned, contracted, and regulated;

24 f. Due to various peculiar conditions relating to the SUBJECT
25 INTERSECTION, including, but not limited to, the various defective conditions as stated
26 herein, the presence of high pedestrian traffic, the average rate of speed of motorists on the
27 intersection of Saddle Mountain Drive and Triunfo Canyon Road, the average motor
28 vehicle traffic, the street width, street markings, traffic control devices, shoulders, fence

1 lines, hedge lines, tree lines, sightlines, sight distances, and the street lights the SUBJECT
2 INTERSECTION and/or on adjacent property were necessary in order for pedestrians,
3 bicyclists and/or motorists to safely travel through the SUBJECT INTERSECTION.

4 Despite the fact that various peculiar conditions relating to the SUBJECT
5 INTERSECTION rendered the pedestrian warning lights located at the SUBJECT
6 INTERSECTION and/or adjacent property necessary for safe travel by pedestrians, there
7 was a lack of such necessary pedestrian warning lights and street lights. The pedestrian
8 warning lights that were present, lacked visibility to adequately warn drivers. In addition,
9 the warning lights and street lights located at SUBJECT INTERSECTION and/or on
10 adjacent property were not functioning or were functioning defectively at the time of the
11 SUBJECT COLLISION;

12 g. The SUBJECT INTERSECTION's lanes, striping, markings, signing,
13 shoulders, fence lines, hedge lines, tree lines, sightlines, and sight distances where the
14 SUBJECT COLLISION occurred created an unreasonable risk of harm because of, among
15 other things, there was inadequate and unsafe sight lines and sight distances for drivers
16 traversing and travelling through the SUBJECT INTERSECTION.

17 h. The SUBJECT INTERSECTION lacks traffic control devices and/or
18 warning devices at the SUBJECT INTERSECTION and/or on adjacent property that were
19 necessary to prevent the SUBJECT INTERSECTION from being a concealed trap for
20 pedestrians;

21 i. The rate of motor vehicle traffic, as well as pedestrian traffic at the
22 intersection of Saddle Mountain Drive and Triunfo Canyon Road at the SUBJECT
23 INTERSECTION, at the time of the SUBJECT COLLISION, combined with the high
24 speed limit at the intersection of Saddle Mountain Drive and Triunfo Canyon Road, were
25 of such a high nature, that the SUBJECT CROSSWALK should have not existed at the
26 SUBJECT INTERSECTION without traffic device enhancements to provide warning of
27 the well-known high presence or pedestrians using or traveling through the SUBJECT
28 INTERSECTION;

1 j. The SUBJECT INTERSECTION and SUBJECT CROSSWALK lacked
2 warning signs, either temporary or permanent, that would have provided warning to
3 motorists driving at the intersection of Saddle Mountain Drive and Triunfo Canyon Road
4 or to pedestrians traveling thereon of the dangerous conditions described herein;

5 k. The SUBJECT INTERSECTION and adjacent property was defectively and
6 negligently inspected, maintained and controlled so as to create a concealed trap for
7 pedestrians;

8 l. The combination of the above-referenced dangerous conditions created a
9 concealed trap to foreseeable users of the SUBJECT INTERSECTION; and

10 m. Trees and/or other vegetation obscured indicators of an upcoming
11 intersection and/or crosswalk from drivers operating vehicles in a reasonably foreseeable
12 manner.

13 19. PLAINTIFFS are informed, believe, and thereon allege, that DEFENDANTS and
14 DOES 1 through 100, inclusive, and each of them, owned, built, drafted, engineered, designed,
15 inspected, regulated, modified, directed, supervised, planned, contracted, maintained and
16 controlled the SUBJECT INTERSECTION and adjacent/surrounding property. PLAINTIFFS are
17 informed, believe, and thereon allege, that DEFENDANTS caused, created and/or allowed to exist
18 and to continue to exist said dangerous condition(s) with respect to the SUBJECT
19 INTERSECTION and adjacent/surrounding property. PLAINTIFFS are further informed, believe,
20 and allege that the misconduct of DEFENDANTS in causing, creating, allowing to exist and to
21 continue to exist said dangerous condition(s) with respect to the SUBJECT INTERSECTION
22 created a reasonably foreseeable risk of injury to pedestrians using the SUBJECT
23 INTERSECTION in a reasonable manner.

24 20. The SUBJECT INTERSECTION and SUBJECT CROSSWALK were improperly
25 supervised, controlled, contracted, inspected, repaired, maintained, monitored, and worked on with
26 regard to design configurations, geometrics, sight distance, absence of traffic control devices and
27 warning devices, the presence of certain topography, vegetation, shrubbery, appurtenances,
28 physical features, fixtures, on and adjacent to the SUBJECT INTERSECTION and the SUBJECT

1 CROSSWALK, which created a dangerous condition which was not reasonably apparent to
2 prudent motorists and pedestrians.

3 21. As a direct and foreseeable result of this dangerous condition, the views of drivers
4 traversing at or near the SUBJECT INTERSECTION were substantially impaired, which made a
5 safe and proper evaluation of cross traffic not reasonably feasible or possible.

6 22. The SUBJECT INTERSECTION and adjacent property was defectively and
7 negligently inspected, maintained and controlled so as to create a concealed trap for pedestrians
8 and the combination of the above-referenced dangerous conditions created a concealed trap to
9 foreseeable users of the SUBJECT INTERSECTION.

10 23. Based upon the aforementioned facts, said property and roadway constituted a
11 dangerous condition of public property at the time of the SUBJECT COLLISION for many
12 reasons, including, but not limited to, the following:

13 a. The SUBJECT INTERSECTION was dangerous and defectively planned,
14 designed, drafted, engineered, constructed; and positioned, and was either not approved in
15 accordance with standard procedure, regulations and statutes (thereby violating same) or
16 could not reasonably have been approved by any appropriate and responsible governmental
17 entity or any delegates and agents thereof;

18 b. To the extent the design of the SUBJECT INTERSECTION was approved,
19 if any approval was requested and given, the requesting and responding
20 authority(ies)/delegate(s) and agent(s) were incompetent or failed to possess the requisite
21 skills and expertise to render a reasonable evaluation of the benefits, risks and dangers of
22 the plan as submitted or amended and approved;

23 c. To the extent the design of the SUBJECT INTERSECTION was approved,
24 said approval was unreasonable and constituted a manifest abuse of discretion or was
25 otherwise negligent by failing to address the applicable engineering standards and
26 conditions then existing or reasonably contemplated to exist in the future, once said design
27 was implemented;

28 d. The SUBJECT INTERSECTION and adjacent property were at all times

1 dangerous, improperly and defectively maintained, managed, inspected, installed, repaired,
2 modified, reviewed, and evaluated, if in fact it was maintained, managed, inspected,
3 reviewed, and evaluated. To the extent such functions were not performed, they should
4 have been, and to the extent they were performed, they were done improperly, negligently,
5 and violated applicable engineering standards and regulations pertaining to similarly
6 situated roadways;

7 e. The SUBJECT INTERSECTION and its adjacent property was at all
8 relevant times in a dangerous condition due to the lack of appropriate signage, markings,
9 delineation, warnings, or other measures necessary to prevent the accidents of the type that
10 occurred in this case;

11 f. There was negligence in the ownership, control, construction, maintenance,
12 inspection, placement, supervision, repairs, design, modifications of and to the SUBJECT
13 INTERSECTION, including creating and failing to warn against non-obvious and
14 concealed traps. There was further negligence in a failure to warn of these known risks
15 and hazards, some of which were created by DEFENDANTS and DOES 1 through 100,
16 inclusive, and each of them, and/or DEFENDANTS' agents/employees, and some of which
17 existed for a sufficient period of time to provide warnings and/or remove the risk or hazard
18 and failure to warn of previous similar incidents; and

19 g. The area of the SUBJECT COLLISION was in a dangerous condition
20 because of the failure to exercise due care in the ownership or control of the SUBJECT
21 ROADWAY and adjacent property in the lack of any or insufficient and/or defective
22 warning signs, signals, or other forms of warning, as well as other dangers noted above,
23 created a concealed trap. There was a failure to warn of these known risks and hazards,
24 some of which were created by DEFENDANTS and DOES 1 through 100, inclusive, and
25 each of them, and/or DEFENDANTS' agents/employees, and some of which existed for a
26 sufficient period of time to provide warnings and/or remove the risk or hazard.

27 Additionally, DEFENDANTS further engaged in a failure to warn of a high number of
28 previous vehicle collisions and collisions involving pedestrians of a similar nature to the

1 SUBJECT COLLISION at said location.
2 24. This unreasonable risk of harm was of such a nature and existed long enough that
3 GOVERNMENT ENTITIES had sufficient time to discover it and, using reasonable care, repair
4 the unreasonable risk of harm, or protect against harm from the condition, or adequately warn of
5 the unreasonable risk of harm. Indeed, GOVERNMENT ENTITIES actually knew of this
6 dangerous condition based upon numerous prior collisions at or near this same location,
7 complaints regarding the SUBJECT INTERSECTION, their maintenance of the SUBJECT
8 INTERSECTION, public hearings regarding the SUBJECT INTERSECTION. Yet, they failed to
9 use reasonable care and failed to repair the unreasonable risk of harm, failed to protect against
10 harm from the condition, and/or failed to adequately warn of the unreasonable risk of harm created
11 by, among other things, these inadequate and unsafe sight lines and sight distances. As a direct
12 and foreseeable result of these failures, the location of the SUBJECT COLLISION constituted a
13 concealed trap to all foreseeable users, including Decedents.

14 25. PLAINTIFFS are informed, believe, and thereon allege, that DEFENDANTS and
15 DOES 1 through 100, inclusive, and each of them, had, within the meaning of Government Code
16 section 835.2, actual and constructive knowledge of the said dangerous and defective conditions of
17 the SUBJECT INTERSECTION for a sufficient period of time prior to the SUBJECT
18 COLLISION to have taken measures to prevent its dangerous character.

19 26. PLAINTIFFS are informed, believe, and thereon allege, that said dangerous
20 condition(s) were not, nor would not have been, reasonably apparent to, and were not, nor would
21 not have been, anticipated by, persons exercising due care, such as Plaintiff. Plaintiff is further
22 informed and believes, and thereon alleges, that said dangerous conditions were the legal, direct
23 and proximate cause of the injury and damages suffered by Plaintiff.

24 27. PLAINTIFFS further allege, that the DEFENDANTS and DOES 1 through 100,
25 inclusive, and each of them, and its employees, agents, servants and independent contractors, also
26 face liability for PLAINTIFFS' damages pursuant to Government Code sections 815.2, 815.4 and
27 820(a) *et seq.*, for negligently, carelessly, and/or recklessly owning, designing, maintaining,
28 allowing, permitting, regulating, controlling, servicing, inspecting, repairing, modifying, altering,

1 monitoring, improving, constructing, warning or failing to warn, and/or supervising in regards to
2 the SUBJECT INTERSECTION, and said negligent, careless and reckless acts or failures to act
3 created said dangerous and defective conditions of said property, which legally caused the
4 SUBJECT COLLISION and the injuries and damages of PLAINTIFFS as herein alleged.

5 28. PLAINTIFFS are further informed and believe, and thereon allege, that at all times
6 mentioned herein, these DEFENDANTS' complained of acts directly, legally, and proximately
7 caused the SUBJECT COLLISION, Decedents' death, and PLAINTIFFS' resulting harm.

8 29. As a legal, direct, and proximate result of the negligence, carelessness, and/or
9 violation of the law, by DEFENDANTS, and each of them, including DOES 1 through 100,
10 inclusive, PLAINTIFFS have sustained damages resulting from the loss of love, companionship,
11 comfort, care, assistance, protection, affection, society, and support, expectations of future
12 support, and counseling, companionship, solace and mental support, as well as other benefits and
13 assistance, of their respective decedent, all to their general damage in a sum in excess of the
14 jurisdictional limits of this Court, which will be stated according to proof, in accordance with
15 California Code of Civil Procedure section 425.10.

16 30. Furthermore, plaintiffs NANCY ISKANDER AND ZACHARY ISKANDER
17 personally observed the SUBJECT COLLISION, and Decedents' ultimate passing. As a legal,
18 direct, and proximate result of the negligence of DEFENDANTS and DOES 1 through 100,
19 inclusive, with respect to the above-described dangerous condition of public property, plaintiffs
20 NANCY ISKANDER and ZACHARY ISKANDER suffered serious emotional distress.

21 31. As a legal, direct, and proximate result of the conduct of DEFENDANTS, and each
22 of them, including DOES 51 through 100, inclusive, PLAINTIFFS, and each of them, have
23 incurred economic losses, including, but not limited to, funeral and burial expenses in an amount
24 to be stated according to proof, pursuant to California Code of Civil Procedure section 425.10.

25
26 **PRAYER FOR RELIEF**

27 WHEREFORE, PLAINTIFFS NANCY ISKANDER and KARIM ISKANDER, both
28 individually and as successors in interest to Mark and Jacob Iskander, respectively, and

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1 ZACHARY ISKANDER, individually, through his Guardian ad Litem KARIM ISKANDER,
2 prays for judgment against defendants STATE OF CALIFORNIA, DEPARTMENT OF
3 TRANSPORTATION OF THE STATE OF CALIFORNIA (CALTRANS), a public entity; CITY
4 OF WESTLAKE VILLAGE, a public entity; COUNTY OF LOS ANGELES, a public entity; and
5 DOES 1 through 100, inclusive, and each of them, as follows:

- 6 i) For past and future non-economic damages in an amount in excess of the
7 jurisdictional minimum, according to proof;
8 ii) For past and future economic damages in an amount in excess of the jurisdictional
9 minimum, according to proof;
10 iii) For such other and further relief as this Court may deem just and proper.

11
12 DATED: July 29, 2021

PANISH SHEA & BOYLE LLP

13
14
15 By: 

16 Brian Panish
17 Andrew Owen
18 Nicholas W. Yoka
19 Attorneys for Plaintiffs

20
21
22 **DEMAND FOR JURY TRIAL**

23 PLAINTIFFS NANCY ISKANDER and KARIM ISKANDER, both individually and as
24 successors in interest to Mark and Jacob Iskander, respectively, and ZACHARY ISKANDER,
25 individually, through his Guardian ad Litem KARIM ISKANDER, hereby demand trial by jury for
26 all causes of action that may be tried to a jury.

27 DATED: July 29, 2021

PANISH SHEA & BOYLE LLP

28 By: 

Brian Panish
Andrew Owen
Nicholas W. Yoka
Attorneys for Plaintiffs