

JEFF FINE  
 Clerk of the Superior Court  
 By Kristy Kee, Deputy  
 Date 08/09/2019 Time 10:20:34

Description	Amount
CASE# CV2019-008415	
CIVIL NEW COMPLAINT	333.00
TOTAL AMOUNT	333.00

Receipt# 27361499

**RUDOLPH & HAMMOND, LLC.**  
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Attorneys for Plaintiff

**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**

**IN AND FOR THE COUNTY OF MARICOPA**

RONALD YUNIS dba ARIZONA CLASSIC  
 AUTO; and JOHN DOES I-X,

Plaintiff,

v.

MEGAN R. DETERMAN and JOHN DOE  
 DETERMAN, wife and husband, and JOHN  
 DOES I-X,

Defendants.

CV2019-008415

Case No.:

**COMPLAINT**

(Tort – Motor Vehicle)

Plaintiff, by and through counsel undersigned, hereby alleges as follows:

1. Plaintiff is a resident of Maricopa County, State of Arizona.
2. Upon information and belief, Defendant Megan Determan ("Defendant")

and John Doe Determan are residents of Maricopa County. At all relevant times, Defendant Megan Determan was acting in furtherance of the marital community.

3. John Does I-X are persons, partnerships, corporations, or unincorporated associations subject to suit in a common name whose names are unknown to Plaintiff and who are, therefore, designated as fictitious names pursuant to Rule 10(f), Arizona Rules of Civil Procedure. Each of these Defendants caused Plaintiff injuries by negligence or by breach of duties owed to Plaintiff, or is responsible as a matter of law for acts of others who caused Plaintiff injuries by such negligence of breach of duty

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1 When the true name and identity of the fictitious person and/or entities are ascertained,  
2 Plaintiff will seek leave of the court to amend their Complaint in compliance with Rule  
3 15, Arizona Rules of Civil Procedure.

4 4. Defendants caused certain events to occur in Maricopa County, Arizona,  
5 which give rise to this action, as hereinafter described.

6 5. Venue is proper in Maricopa County and the amount of controversy  
7 satisfies the jurisdictional requirement of the Superior Court.

8 6. Based on the facts of the case, pursuant to 8(b)(2) of the Arizona Rules of  
9 Civil Procedure, this is Tier 2 case.

10 7. On March 14, 2019, at approximately 4:33 p.m., Defendant failed to  
11 control the speed of her vehicle and collided with the rear of a 2012 Ferrari driven by  
12 Kelly Yunis and owned by Plaintiff. The collision occurred at the intersection of 7<sup>th</sup> Street  
13 and Weldon in Phoenix, Arizona.

14 8. On March 14, 2019, Defendant failed to maintain a proper lookout, failed  
15 to operate her vehicle at a reasonable and prudent speed and failed to control her  
16 vehicle so as to avoid a collision. Such actions on the part of Defendant were  
17 negligent and were the sole and proximate cause of the collision.

18 9. As a direct and proximate result of the negligence of Defendant, Plaintiff's  
19 vehicle sustained significant property damage which has resulted in a diminishment in  
20 the value of the vehicle. Plaintiff prays for leave to show the amount of said loss at the  
21 time of trial.

22 10. As a further direct and proximate result of the negligence of Defendant,  
23 Plaintiff sustained a loss of use of the damaged vehicle. Plaintiff prays for leave to  
24 show the amount of said loss at the time of trial.

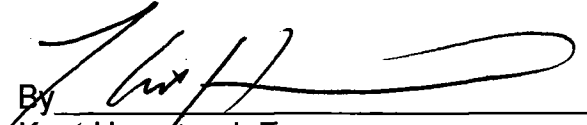
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WHEREFORE, Plaintiff prays for judgment against the Defendants as follows:

- A. An amount representative of the post-collision loss in value of Plaintiff's vehicle;
- B. An amount representative of the loss of use experienced by Plaintiff;
- C. All costs incurred;
- D. Such other relief as this Court deems appropriate.

DATED this 8<sup>th</sup> day of August, 2019.

RUDOLPH & HAMMOND, LLC

By   
Kent Hammond, Esq.