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**FILED**  
Superior Court of California  
County of Los Angeles

02/04/2022

Sherri R. Carter, Executive Officer / Clerk of Court

By: S. Azizian Deputy

8  
9 **SUPERIOR COURT OF THE STATE CALIFORNIA**  
10 **FOR THE COUNTY OF LOS ANGELES – CENTRAL JUDICIAL DISTRICT**  
11 **UNLIMITED JURISDICTION**

12 PAULA BRUCE, an individual,

13  
14 Plaintiff,

15 v.

16  
17 JESSE WILLIAMS, an individual;  
AUGUST MOON, INC., a California  
18 Corporation; and DOES 1 to 25, inclusive,

19  
20 Defendants.

Case No. 22STCV02030

Action Filed: January 18, 2022

Assigned to the Hon. Serena R. Murillo, Dept. 29

**FIRST AMENDED COMPLAINT**

**Trial:**

Date: July 18, 2023

Time: 8:30 a.m.

Dept: 29

DEMAND FOR JURY TRIAL

1 Plaintiff PAULA BRUCE (“Plaintiff”) complains and alleges as follows:

2 **INTRODUCTION**

3 1. The incident that is the subject matter of this Complaint occurred on January 20,  
4 2020, at approximately 5:30 p.m. at the intersection of N. La Brea Drive and Fountain Avenue,  
5 in the City of Los Angeles, County of Los Angeles, State of California.

6 2. It involved Defendant Jesse Williams and Plaintiff Paula Bruce.

7 3. Upon information and belief, Jesse Williams is proclaimed to be a “famous”  
8 American actor, director, and celebrity producer, presumably due to his role as “Dr. Jackson”  
9 on the American television show, “Grey’s Anatomy.” However, the incident which occurred  
10 was no work of fiction, rather it was a serious matter which caused serious injuries. On further  
11 information and belief, at the time of the foregoing incident, Defendant Jesse Williams,  
12 suddenly and without warning, crashed into Plaintiff Paula Bruce’s vehicle while she was  
13 stopped at a red traffic light. Instead of remaining at the scene as required to do so, provide his  
14 identity and accurate insurance information, Defendant Jesse Williams did the opposite. At the  
15 scene, Defendant Jesse Williams intentionally misrepresented his identity, failed to provide his  
16 identification, even provided inaccurate insurance information. What is even more shocking is  
17 that Defendant Jesse Williams represented himself to be an individual named “August Moon.”  
18 Soon after the incident, and with complete disregard to the injuries suffered by Plaintiff Paula  
19 Bruce, Defendant Jesse Williams decided to flee the scene *without* any notice. Not only did  
20 Defendant Jesse Williams give a false identity and inaccurate insurance information, Defendant  
21 Jesse Williams even abandoned his high-priced Porsche Cayenne in the middle of the road  
22 unattended for over 30 minutes. Then suddenly, an individual appeared, who was not Defendant  
23 Jesse Williams to seemingly interfere with the incident. All the while Plaintiff remained at the  
24 scene of the crash injured and disoriented for over three hours.

25 4. Upon information and belief, other concerning factors may have impaired  
26 Defendant Williams’ judgment causing him to slam his vehicle into the Plaintiff’s stopped car  
27 without warning. These concerning factors could have promogulated his basis for fleeing the  
28 scene of the incident while abandoning his vehicle, giving false information about his insurance

1 and identity.

2 5. All individuals regardless of their status, whether it be celebrity or otherwise  
3 who operate a vehicle on public roads are required to abide by the same duties and laws as all  
4 other drivers.

5 **PARTIES AND JURISDICTION**

6 6. Plaintiff PAULA BRUCE (“Plaintiff”) is an individual who is, and at all times  
7 mentioned herein was, a resident of the County of Los Angeles, State of California. At the time  
8 of the incident that is the subject matter of this Complaint, she was 53 years old.

9 7. Upon information and belief, Defendant JESSE WILLIAMS (“Defendant  
10 Williams”) is an individual who is, and at all times mentioned herein was, a resident of the  
11 County of Los Angeles, State of California.

12 8. Upon information and belief, Defendant AUGUST MOON, INC. (Defendant  
13 August Moon” or “Corporation”) is a California Corporation with its principal place of business  
14 in the City of Los Angeles, State of California.

15 9. Defendant Williams, Defendant August Moon, and the DOE Defendants are  
16 collectively referred to as “Defendants.”

17 10. Upon information and belief, at all times relevant herein, Defendant Williams  
18 was acting within the purpose and scope of employment, agency, and or partnership for and at  
19 the direction of and agreement Defendant August Moon.

20 11. Plaintiff is informed and believes, and based thereupon alleges, that at all times  
21 relevant to this Complaint, Defendant Williams was acting as the agent, servant, employee,  
22 subsidiary, joint venturer, affiliate, partner, assignee, successor-in-interest, *alter ego*, or other  
23 representatives of each other, and was acting within the course and scope of his agency,  
24 servitude, employment, subsidy, joint venture, affiliation, partnership, assignment, succession,  
25 *alter ego*, and/or representation, with the full knowledge, consent, permission, authorization,  
26 and ratification, either express or implied, of each of the other Defendants (including but not  
27 limited to the DOE Defendants), in performing the acts alleged in this Complaint.

28 12. Defendant Williams is jointly and severally liable for the acts and omissions of

1 the Corporation alleged herein as he was the Corporation's *alter ego*.

2 13. Plaintiff is ignorant of the true names and capacities of DOES 1 through 25,  
3 inclusive, and therefore sues said Defendants by such fictitious names. Plaintiff will amend this  
4 Complaint to allege their true names and capacities when ascertained. Plaintiff is informed and  
5 believes, and based thereon alleges, that each of said fictitiously named Defendants were, and  
6 continues to be, responsible and liable for the acts or omissions alleged herein.

7 14. Plaintiff is informed and believes that at all times relevant to the allegations  
8 herein, that each Defendant, including the DOE Defendants, was the agent and partner of each  
9 of the other Defendants and was at all times acting within the purpose and scope of such agency  
10 and partnership, and at the direction of and agreement with the other Defendants.

11 15. Plaintiff is informed and believes that at all times relevant to the allegations  
12 herein, that each Defendant, including the DOE Defendants, operated the motor vehicle driven  
13 at the time of the incident.

14 16. Plaintiff is informed and believes that at all times relevant to the allegations  
15 herein, that each Defendant, including the DOE Defendants, owned the motor vehicle which  
16 was operated with their permission at the time of the incident.

17 17. Plaintiff is informed and believes that at all times relevant to the allegations  
18 herein, that each Defendant, including the DOE Defendants, negligently entrusted the vehicle to  
19 Defendant even though he knew he did not possess the requisite skill, care, control, training,  
20 knowledge, and management to operate a motor vehicle on the public streets of the City of Los  
21 Angeles, and knew that he would and could endanger the health and well-being of persons on  
22 the street and in vehicles in the area where he operated the vehicle.

23 18. Plaintiff is informed and believes that at all times relevant to the allegations  
24 herein, that each Defendant, including the DOE Defendants, were the agents and employees of  
25 the other defendants and acted within the scope of the agency at the time of the incident.

26 19. Venue is proper in this Court under Civ. Proc. Code § 395 as all of the injuries  
27 occurred in the County of Los Angeles.

28 20. This matter is within the unlimited jurisdiction of this Court, as the amount in

1 controversy, exclusive of interest and costs, exceeds \$25,000.

2 **STATEMENT OF FACTS**

3 21. Upon information and belief, Plaintiff is a renowned psychologist with a practice  
4 in Beverly Hills, California. She works with adults, children, couples, and families focusing on  
5 but not limited to personality disorders, sexual abuse trauma, sexual perpetration, sexual  
6 additional, relationship issues, depressive disorders, anxiety disorders, eating disorders, etc.  
7 Plaintiff by nature is a healer. She assists those injured and helps them release their deepest,  
8 darkest traumas. In this matter, however, Plaintiff's role was reversed. She is the one seriously  
9 injured and required (and continues to require) medical assistance following a violent crash.

10 22. Upon information and belief, on the evening of January 20, 2020, Plaintiff was  
11 driving North on La Brea Drive, making her commute from work to home. She's made the  
12 same drive hundreds of times. On this day, it was around 5:00 p.m. The sun was still out, and  
13 the conditions of the road were clear. Traffic was seemingly open, which is rare in Los Angeles.  
14 As Plaintiff made her way home on what was otherwise a quiet evening, she obeyed all laws  
15 and drove in a safe and proper manner, when suddenly and without warning the rear of her  
16 vehicle was careened into.

17 23. Upon information and belief, at approximately 5:30 p.m., Plaintiff was at or  
18 about the intersection of North La Brea Drive and Fountain Avenue. She was at a complete stop  
19 at a red traffic light when her vehicle was negligently and violently smashed into by a brand  
20 new Porsche Cayenne. Upon further information and belief, the Porsche Cayenne was owned  
21 and operated by Defendant Williams. Plaintiff's vehicle was struck with such force and  
22 velocity that the crash caused her head to strike the headrest before violently colliding into the  
23 steering wheel. This resulted in a large abrasion and immediate swelling to Plaintiff's forehead.

24 24. Upon information and belief, Defendant Williams was presumably speeding in  
25 his brand new Porsche. His vehicle smashed into Plaintiff's vehicle at such high-speed that all  
26 the airbags in Defendant Williams' vehicle deployed. There was no indication that there was  
27 any attempt to exercise the brakes prior to impact.

28 25. Upon information and belief, immediately after impact, Plaintiff was stunned

1 and concussed. Plaintiff immediately felt pain in her head, neck, shoulder, and back. She could  
2 not move from inside her vehicle for approximately 10 minutes. She sat in her vehicle confused  
3 and disoriented. She did not understand what had happened. Then, Plaintiff contacted and  
4 called 911 from assistance while she remained immobile inside her vehicle. Subsequently,  
5 Plaintiff called her son and told him what happened and that she needed assistance.

6         26. Upon information and belief, approximately 15 minutes after the crash, an  
7 individual approached Plaintiff. He did not identify himself. Plaintiff informed Defendant  
8 Williams that she called 911 and reported the crash. Defendant Williams then returned to his  
9 car while the Plaintiff stayed in her car to wait for help, and contacted her son for assistance.  
10 Approximately 10 minutes later, the Plaintiff exited her car and approached Defendant  
11 Williams who had returned to his car and asked to exchange identification and insurance  
12 information. She provided him with her name, ID and insurance information. Defendant  
13 Williams provided an “insurance document” and stated he did not have his ID. Instead, he  
14 identified himself as “August Moon.” August Moon is the alias for Defendant Williams. Upon  
15 further information and belief when Plaintiff requested identification and insurance information  
16 from Defendant Williams, Defendant Williams failed to reveal his proper identity, failed to  
17 provide his identification and proof of identity, and instead continued to represent himself as  
18 “August Moon” to Plaintiff. Upon further information and belief, Defendant Williams presented  
19 Plaintiff with an invalid insurance card, which contained false, improper, and/or inaccurate  
20 insurance information.

21         27. Upon information and belief, approximately 20 minutes after the crash, Plaintiff  
22 realized that the insurance information provided by Defendant Williams was not accurate. She  
23 looked for Defendant Williams and realized that he was no longer in or near his car. Defendant  
24 Williams failed to remain at the scene of the incident until police arrived and instead fled the  
25 scene in a separate vehicle without announcing his departure. His departure was observed and  
26 reported on by Plaintiff’s son who had just arrived on the scene. Defendant Williams did not  
27 notify Plaintiff that he was leaving and simply disappeared. What’s more, Defendant Williams  
28 recklessly left his brand-new Porsche worth over \$100,000 vacant in the middle of the road

1 unattended for approximately 30 minutes when he fled the scene.

2 28. Upon information and belief, Plaintiff sat in her vehicle confused when she  
3 could not see Defendant Williams in his vehicle. Suddenly, about 30 minutes later, an  
4 individual appeared “on behalf” of Defendant Williams’, who was not Defendant Jesse  
5 Williams to seemingly interfere with the incident. Said individual represented herself as his  
6 assistant. She did not identify him by name. She was informed by the Plaintiff that the  
7 Defendant had not provided accurate insurance information and she began to make a phone call  
8 to try to obtain it. She took photographs of the vehicles and of Plaintiff’s face and head  
9 showing the head injury.

10 29. Upon information and belief, Defendant Williams had complete disregard for  
11 Plaintiff’s safety and left the scene as Plaintiff remained there injured and disoriented. Plaintiff  
12 properly remained at the scene of the crash for over three hours.

13 30. Upon information and belief, other concerning factors may have impaired  
14 Defendant Williams’s judgment causing him to violently slam his vehicle into Plaintiff’s  
15 stopped car without warning. These concerning factors could have promogulated his basis for  
16 fleeing the scene of the incident while abandoning his vehicle. There was no paparazzi at the  
17 scene or other basis for his conspicuous departure.

18 31. California Vehicle Code Section § 20003 (a) states:

19 The driver of any vehicle involved in an accident resulting in injury to or death of  
20 any person shall also give his or her name, current residence address, the names and  
21 current residence addresses of any occupant of the driver’s vehicle injured in the  
22 accident, the registration number of the vehicle he or she is driving, and the name  
23 and current residence address of the owner to the person struck or the driver or  
24 occupants of any vehicle collided with, and shall give the information to any traffic  
25 or police officer at the scene of the accident. The driver also shall render to any  
26 person injured in the accident reasonable assistance, including transporting, or  
27 making arrangements for transporting, any injured person to a physician, surgeon,  
28 or hospital for medical or surgical treatment if it is apparent that treatment is  
necessary or if that transportation is requested by any injured person.

26 32. California Vehicle Code Section § 20003 (a) applies to all individuals regardless  
27 of their status.

28 33. Defendants, and each of them violated California Vehicle Code Section § 20003

1 (a).

2 34. As a proximate and foreseeable result of the incident, Plaintiff sustained painful  
3 injuries to areas of her body some of which may be permanent.

4 35. Plaintiff needed and needs continuing treatment and therapy.

5 36. As a proximate and foreseeable result of the incident, Plaintiff suffered serious  
6 and permanent emotional distress and trauma.

7 **FIRST CAUSE OF ACTION**

8 **(For Negligence)**

9 **Brought By Plaintiff Against All Defendants**

10 37. Plaintiff realleges and incorporates herein every allegation contained above.

11 38. At all times relevant herein, Defendants and each of them were obligated to  
12 entrust, manage, operate, maintain, and use a motor vehicle in a reasonable manner, given the  
13 circumstances of its use on the public roadways in the City of Los Angeles, State of California.

14 39. Upon information and belief, and at all times relevant herein, Defendant  
15 Williams drove, operated, and managed a 2018 black Porsche Cayenne Hybrid, License Plate  
16 No. 55SM333, and Vin No: WP1AE2A2XJLA71304.

17 40. On information and belief, and at all times relevant herein, Defendant August  
18 Moon owned, controlled, entrusted, and/or managed said vehicle to Defendant Williams at the  
19 time of the incident.

20 41. Defendants, and each of them, were negligent and reckless in the manner in  
21 which he/it owned, controlled, and operated his/its vehicle, driving at an unsafe speed, so as to  
22 proximately cause the aforementioned incident.

23 42. January 20, 2020, at the aforementioned location, a public street and highway,  
24 Defendants, and each of them owned, controlled, operated, maintained, and dangerously  
25 managed their vehicles, striking the vehicle in which Plaintiff was an occupant.

26 43. On January 20, 2020, at the aforementioned location, a public street, and  
27 highway, Defendant August Moon negligently entrusted a 2018 black Porsche Cayenne Hybrid,  
28 License Plate No. 55SM333, and Vin No: WP1AE2A2XJLA71304 to Defendant Williams at



1 the time of the incident even though he knew he did not possess the requisite skill, care, control,  
2 training, knowledge and management to operate a motor vehicle on the public streets of the  
3 City of Los Angeles, and knew that he would and could endanger the health and well-being of  
4 persons on the street and in vehicles in the area where he operated the vehicle.

5 44. California Vehicle Code § 22340 states: “No person shall drive a vehicle upon a  
6 highway at a speed greater than is reasonable or prudent having due regard for weather,  
7 visibility, the traffic on, and the surface and width of, the highway, and in no event at a speed  
8 which endangers the safety of persons or property.”

9 45. California Vehicle Code § 22350 states: “No person shall drive a vehicle upon a  
10 highway at a speed greater than is reasonable or prudent having due regard for weather,  
11 visibility, the traffic on, and the surface and width of, the highway, and in no event at a speed  
12 which endangers the safety of persons or property.”

13 46. California Vehicle Code § 20002 states “The driver of any vehicle involved in an  
14 accident resulting only in damage to any property, including vehicles, shall immediately stop  
15 the vehicle at the nearest location that will not impede traffic or otherwise jeopardize the safety  
16 of other motorists.”

17 47. On information and belief, Defendant Williams violated California Vehicle Code  
18 §§ 22340, 22350, 20002, and 20003.

19 48. Since the Vehicle Code establishes the standard of care required to operate a  
20 motor vehicle, conduct that falls below this statutory standard is negligence *per se* or negligence  
21 as a matter of law. (*Aldrid v. Vanier* (1958) 50 Cal.2d 617, 621; *Shehtadian v. Kenny* (1958)  
22 156 Cal. App.2d 576).

23 49. By each of the wrongful acts and omissions alleged above, Defendants and each  
24 of them materially breached said duties of care.

25 50. Defendants are liable to Plaintiff for negligence *per se*. (See CACI No. 418.)

26 51. Gross negligence means want of even scant care or an extreme departure from  
27 the ordinary standard of conduct. (*City of Santa Barbara v. Superior Court* (2007) 41 Cal.4th  
28 747, 754). Defendants’ material breaches of said duties constituted scant care and an extreme

1 departure from the ordinary standard of conduct. Defendants consciously, recklessly, with a  
2 complete disregard and lack of concern for the safety of Plaintiff drove a vehicle on a public  
3 highway and failed to take the reasonable steps following the collision. Defendants, and each of  
4 them failed to comply with California Vehicle Code Section § 20003 (a) and departed the scene  
5 of the crash *without* notice. Defendant Williams left Plaintiff alone at the scene of the crash  
6 injured and disoriented for over 30 minutes. This conduct is reckless and an extreme departure  
7 from the ordinary standard of conduct

8 52. Plaintiff requests a large award of punitive damages as Defendants' conduct  
9 constituted despicable gross negligence. (Civ. Code § 3294.)

10 53. In the alternative, Defendants committed ordinary negligence.

11 54. As a direct and proximate result of Defendants' negligence, Plaintiff has  
12 incurred, and will incur, medical and related expenses in an amount according to proof at trial.

13 55. Plaintiff did not by any act or omissions on her part wholly or partly cause or  
14 contribute wholly or in part to the breaches or her injuries or losses.

15 56. As a proximate result of a breach of the duty of reasonable care, Plaintiff  
16 suffered the injuries and losses alleged above. Defendants are liable to Plaintiff, therefore.

17 57. The gross negligence or negligence proximately and foreseeably caused harm to  
18 Plaintiff.

19 58. Defendants are liable to Plaintiff for gross negligence or negligence.

20 59. Defendants' conduct was despicable and subjected Plaintiff to cruel and unjust  
21 hardship in conscious disregard of their rights. This constitutes "oppression" under Civil Code §  
22 3294(c)(2) and justifies the award of exemplary damages.

23 60. Defendants by their conduct willfully and consciously disregarded the rights or  
24 safety of Plaintiff. This constitutes "malice" under Civil Code § 3294(c)(1) and justifies the  
25 award of exemplary damages.

26 61. Plaintiff requests an award of exemplary damages against Defendants, jointly  
27 and severally. Defendants' conduct justifies the award.

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1 **SECOND CAUSE OF ACTION**

2 **(For Intentional Infliction of Emotional Distress)**

3 **Brought By Plaintiff Against Defendant Williams**

4 62. Plaintiff realleges and incorporates herein every allegation contained above.

5 63. Defendant Williams conduct of leaving the scene of the incident without notice,  
6 failing to wait for the police to arrive, and failing to provide his real name or identification  
7 constitutes as outrageous conduct.

8 64. Said actions amount to a conscious disregard of the high probability and  
9 substantial certainty Defendants would and did cause the Plaintiff severe emotional distress.

10 65. Defendant knew that his conduct would result in Plaintiff suffering from severe  
11 emotional distress.

12 66. Defendant acted with reckless disregard of the severe emotional distress that his  
13 conduct would cause.

14 67. As a direct and proximate result of Defendant's conduct, Plaintiff suffered  
15 illness, physical injury, severe mental and emotional distress, depression, anxiety, annoyance  
16 and discomfort, fear for safety, property damage, and lost income.

17 68. As a direct and proximate result of Defendant's conduct, Plaintiff suffered  
18 severe mental and emotional distress, in an amount to be proven at trial.

19 69. Defendant is guilty of "oppression" and "malice", as those terms are defined by  
20 Civil Code § 3294(c).

21 70. Plaintiff requests an award of punitive damages against Defendant. Defendant's  
22 conduct justifies such an award.

23 **THIRD CAUSE OF ACTION**

24 **(For Negligent Infliction of Emotional Distress)**

25 **Brought By Plaintiff Against Defendant Williams**

26 71. Plaintiff realleges and incorporates herein every allegation contained above.

27 72. Plaintiff specifically incorporates by reference the allegations of the Second  
28 Cause of Action ("Intentional Infliction of Emotional Distress") and adopts those allegations

1 into this Cause of Action, with the caveat that for purposes of this Cause of Action, Plaintiff  
2 hereby asserts that Defendant acted with negligence or without a reasonable basis, as opposed  
3 to with intent.

4 73. As a direct and proximate result of Defendant's conduct, Plaintiff suffered  
5 illness, physical injury, severe mental and emotional distress, depression, anxiety, annoyance  
6 and discomfort, fear for safety, property damage, and lost income.

7 74. As a direct and proximate result of Defendant's conduct, Plaintiff suffered  
8 severe mental and emotional distress, in an amount to be proven at trial.

9 75. Defendant's negligence was a substantial factor in causing Plaintiff serious  
10 emotional distress.

11 **PRAYER FOR RELIEF**

12 WHEREFORE, Plaintiff requests the following relief against Defendants, jointly and  
13 severally:

- 14 A. All economic and non-economic damages according to proof.
- 15 B. General and special damages according to proof.
- 16 C. Hospital and medical expenses according to proof.
- 17 D. Loss of earnings and earnings capacity according to proof.
- 18 E. Restitution of money and property according to proof.
- 19 F. Punitive damages, pursuant to Civ. Code § 3294.
- 20 G. Prejudgment interest as allowed by law.
- 21 H. Costs of this action.
- 22 I. Such other and further relief as the Court deems just and appropriate.

23 **DEMAND FOR JURY TRIAL**

24 Plaintiff hereby demands a trial by jury on all issues so triable.

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DATED: February 4, 2022

LA CENTURY LAW



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Ryan J. Paneshrad, Esq.  
Shantel Yaghoobian, Esq.  
Counsel for Plaintiff PAULA BRUCE