



26 AUG 20 PM 2:48

FILED AS
THE Bd. OF SUPERVISORS
BY

MAILING ADDRESS: PO BOX 2107
BAKERSFIELD, CALIFORNIA • 93303
PHYSICAL ADDRESS: 833 H STREET
BAKERSFIELD, CALIFORNIA • 93304

August 17, 2026

Via E-mail & 1st Class Mail
walshmar@kerncounty.com

Kern County Board of Supervisors - County of Kern
Attn: MaryClaire Walsh, Liability Claims Adjuster
1115 Truxtun Avenue, 4th Floor
Bakersfield, CA 93301

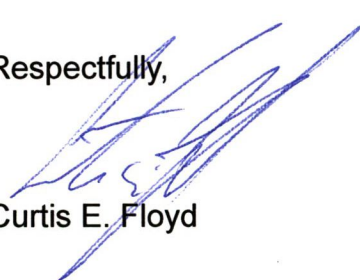
RE: Our Clients : Darren D. Parks and Crystal L. Davis Parks
Your Client : Kern County Board of Supervisors - County of Kern
Date of Loss : 06/20/2025

Dear Ms. Walsh:

Please find enclosed a copy of the Complaint, filed in the above-referenced matter, which was inadvertently left out of our demand letter, dated August 12, 2026.

If you have any questions, please feel free to contact our office at the number and/or address referenced above.

Respectfully,



Curtis E. Floyd

CEF/lis
Encl.

FILED IN CO. CLERK OF
THE BD. OF SUPERVISORS
BY DEPUTY**SUMMONS**
(CITACION JUDICIAL)**NOTICE TO DEFENDANT:** COUNTY OF KERN; MICHAEL BRANDON
(AVISO AL DEMANDADO): BRUMMETT, AN INDIVIDUAL DOES 1 TO 100,
INCLUSIVE**YOU ARE BEING SUED BY PLAINTIFF:** DARREN DEVAUGHN PARKS, AN
(LO ESTÁ DEMANDANDO EL DEMANDANTE): INDIVIDUAL; CRYSTAL
LASSABBRA DAVIS PARKS, AN INDIVIDUALFOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)**ELECTRONICALLY FILED**Superior Court of California,
County of KernBy: Javen Silva
Deputy Clerk**06/16/2026****NOTICE!** You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case.

¡AVISO! Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:
(El nombre y dirección de la corte es):
Superior Court of California, County of Kern
1215 Truxtun Avenue
Bakersfield, California 93301

CASE NUMBER:
(Número del Caso):

26CUB02231

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is: CURTIS E. FLOYD, ESQ.
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):

LAW OFFICE OF CURTIS FLOYD
833 H STREET, BAKERSFIELD, CA 93304

(661) 633-2055

DATE: 06/16/2026 Tara Leal Clerk, by Javen Silva Deputy
(Fecha) (Secretario) (Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)

(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).

NOTICE TO THE PERSON SERVED: You are served

1. ☐ as an individual defendant.
2. ☐ as the person sued under the fictitious name of (specify):

3. ☐ on behalf of (specify):

under: ☐ CCP 416.10 (corporation) ☐ CCP 416.60 (minor)
☐ CCP 416.20 (defunct corporation) ☐ CCP 416.70 (conservatee)
☐ CCP 416.40 (association or partnership) ☐ CCP 416.90 (authorized person)
☐ other (specify):

4. ☐ by personal delivery on (date):

[SEAL]



ATTORNEY OR PARTY WITHOUT ATTORNEY NAME: CURTIS E. FLOYD, ESQ. FIRM NAME: LAW OFFICE OF CURTIS FLOYD STREET ADDRESS: 833 H STREET CITY: BAKERSFIELD STATE: CA ZIP CODE: 93304 TELEPHONE NO.: (661) 633-2055 FAX NO.: (661) 633-1391 EMAIL ADDRESS: curtis@curtisfloydllaw.com ATTORNEY FOR (name): Darren Devaughn Parks, An Individual; Crystal Lassabbra Davis Parks, An Individual	FOR COURT USE ONLY ELECTRONICALLY FILED Superior Court of California, County of Kern By: Javen Silva Deputy Clerk 06/9/26 2:23 PM
SUPERIOR COURT OF CALIFORNIA, COUNTY OF KERN STREET ADDRESS: 1215 Truxtun Avenue MAILING ADDRESS: 1215 Truxtun Avenue CITY AND ZIP CODE: Bakersfield, 93301 BRANCH NAME: Metro Division	
PLAINTIFF: Darren Devaughn Parks, An Individual; Crystal Lassabbra Davis Parks, An Individual DEFENDANT: COUNTY OF KERN; MICHAEL BRANDON BRUMMETT, AN INDIVIDUAL ☒ DOES 1 TO <u>100, INCLUSIVE</u>	
COMPLAINT—Personal Injury, Property Damage, Wrongful Death ☐ AMENDED (Number): Type (check all that apply): ☒ MOTOR VEHICLE ☒ OTHER (specify): GENERAL NEGLIGENCE ☒ Property Damage ☐ Wrongful Death ☒ Personal Injury ☒ Other Damages (specify): LOSS OF CONSORTIUM	CASE NUMBER: 26CUB02231 BY ORDER OF THE BD/SUPV Referred To <u>County Counsel</u> <u>25pgs</u>
Jurisdiction (check all that apply): ☐ ACTION IS A LIMITED CIVIL CASE (does not exceed \$35,000) Amount demanded ☐ does not exceed \$10,000 ☐ exceeds \$10,000 ☒ ACTION IS AN UNLIMITED CIVIL CASE (exceeds \$35,000) ☐ ACTION IS RECLASSIFIED by this amended complaint ☐ from limited to unlimited ☐ from unlimited to limited	Copies Furnished <u>Risk Management</u> <u>Mail</u> Date <u>8-20-26</u> Clerk of the Board of Supervisors By <u>[Signature]</u>, Deputy

SHORT TITLE: PARKS, et al. v. COUNTY OF KERN, et al.

CASE NUMBER:

26CUB02231

4. ☐ Plaintiff (name):
is doing business under the fictitious name (specify):

and has complied with the fictitious business name laws.
5. Each defendant named above is a natural person
- a. ☒ except defendant (name): Does 1 to 15, Inclusive
 (1) ☒ a business organization, form unknown.
 (2) ☐ a corporation.
 (3) ☐ an unincorporated entity (describe):
 (4) ☐ a public entity (describe):
 (5) ☐ other (specify):
- b. ☒ except defendant (name): Does 16 to 30, Inclusive
 (1) ☐ a business organization, form unknown.
 (2) ☒ a corporation.
 (3) ☐ an unincorporated entity (describe):
 (4) ☐ a public entity (describe):
 (5) ☐ other (specify):
- c. ☒ except defendant (name): Does 31 to 45, Inclusive
 (1) ☐ a business organization, form unknown.
 (2) ☐ a corporation.
 (3) ☒ an unincorporated entity (describe):
 (4) ☐ a public entity (describe):
 (5) ☐ other (specify):
- d. ☒ except defendant (name): Does 46 to 60, Inclusive
 (1) ☐ a business organization, form unknown.
 (2) ☐ a corporation.
 (3) ☐ an unincorporated entity (describe):
 (4) ☒ a public entity (describe):
 (5) ☐ other (specify):
- County of Kern and
GOVERNMENT AGENCY - COUNTY
- ☐ Information about additional defendants who are not natural persons is contained in Attachment 5.
6. The true names of defendants sued as Does are unknown to plaintiff.
- a. ☒ Doe defendants (specify Doe numbers): 1 TO 100, INCLUSIVE were the agents or employees of other named defendants and acted within the scope of that agency or employment.
- b. ☒ Doe defendants (specify Doe numbers): 1 TO 100, INCLUSIVE are persons whose capacities are unknown to plaintiff.
7. ☐ Defendants who are joined under Code of Civil Procedure section 382 are (names):
8. This court is the proper court because
- a. ☒ at least one defendant now resides in its jurisdictional area.
- b. ☐ the principal place of business of a defendant corporation or unincorporated association is in its jurisdictional area.
- c. ☒ injury to person or damage to personal property occurred in its jurisdictional area.
- d. ☐ other (specify):
9. ☒ Plaintiff is required to comply with a claims statute, and
- a. ☒ has complied with applicable claims statutes, or
- b. ☐ is excused from complying because (specify):

SHORT TITLE: PARKS, et al. v. COUNTY OF KERN, et al.

CASE NUMBER:

26CUB02231

10. The following causes of action are attached and the statements above apply to each (each complaint must have one or more causes of action attached):

- a. ☒ Motor Vehicle
- b. ☒ General Negligence
- c. ☐ Intentional Tort
- d. ☐ Products Liability
- e. ☐ Premises Liability
- f. ☒ Other (specify): GENERAL NEGLIGENCE; LOSS OF CONSORTIUM.

11. Plaintiff has suffered (check all that apply)

- a. ☒ wage loss.
- b. ☒ loss of use of property.
- c. ☒ hospital and medical expenses.
- d. ☒ general damage.
- e. ☒ property damage.
- f. ☒ loss of earning capacity.
- g. ☒ other damage (specify): LOSS OF CONSORTIUM.

12. ☐ The damages claimed for wrongful death and the relationships of plaintiff to the deceased are

- a. ☐ listed in Attachment 12.
- b. ☐ as follows:

13. The relief sought in this complaint is within the jurisdiction of this court.

14. Plaintiff prays for judgment for costs of suit; for such relief as is fair, just, and equitable; and for

- a. (1) ☒ compensatory damages.
- (2) ☐ punitive damages.
- b. The amount of damages is (in cases for personal injury or wrongful death, you must check (1)):
- (1) ☒ according to proof.
- (2) ☐ in the amount of: \$

15. ☒ The paragraphs of this complaint alleged on information and belief are as follows (specify paragraph numbers): AT ALL TIMES MENTIONED HEREIN, DEFENDANTS AND EACH OF THEM, WERE THE AGENTS AND EMPLOYEES OF EACH OF THE REMAINING DEFENDANTS, AND ACTED WITHIN THE COURSE AND SCOPE OF SUCH AGENCY AND EMPLOYMENT.

Date: JUNE 9, 2026

CURTIS E. FLOYD, ESQ.

(TYPE OR PRINT NAME)

(SIGNATURE OF PLAINTIFF OR ATTORNEY)

SHORT TITLE: PARKS, et al. v. COUNTY OF KERN, et al.

CASE NUMBER:

26CUB02231

FIRST
(number)**CAUSE OF ACTION—Motor Vehicle**ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

Plaintiff (name): DARREN DEVAUGHN PARKS, AN INDIVIDUAL

MV- 1. Plaintiff alleges the acts of defendants were negligent; the acts were the legal (proximate) cause of injuries and damages to plaintiff; the acts occurred

on (date): JUNE 20, 2025

at (place): OR NEAR 27 FEET NORTH OF HOSKING AVENUE, HIGHWAY 99 SOUTH OFF RAMP TO HOSKING AVENUE, CITY OF BAKERSFIELD, COUNTY OF KERN, STATE OF CALIFORNIA.

MV- 2. DEFENDANTS

a. ☒ The defendants who operated a motor vehicle are (names): MICHAEL BRANDON BRUMMETT, AN INDIVIDUAL; AND☒ Does 1 to 100, INCLUSIVEb. ☒ The defendants who employed the persons who operated a motor vehicle in the course of their employment are (names): COUNTY OF KERN; AND☒ Does 1 to 100, INCLUSIVEc. ☒ The defendants who owned the motor vehicle which was operated with their permission are (names): COUNTY OF KERN; AND☒ Does 1 to 100, INCLUSIVEd. ☒ The defendants who entrusted the motor vehicle are (names): COUNTY OF KERN; AND☒ Does 1 to 100, INCLUSIVEe. ☒ The defendants who were the agents and employees of the other defendants and acted within the scope of the agency were (names): COUNTY OF KERN; MICHAEL BRANDON BRUMMETT, AN INDIVIDUAL; AND☒ Does 1 to 100, INCLUSIVEf. ☐ The defendants who are liable to plaintiffs for other reasons and the reasons for the liability are ☐ listed in Attachment MV-2f ☐ as follows:☐ Does _____ to _____

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SHORT TITLE: PARKS, et al. v. COUNTY OF KERN, et al.

CASE NUMBER:

26CUB02231

ATTACHMENT (Number): MV-1*(This Attachment may be used with any Judicial Council form.)*

AT SAID TIME AND PLACE, DEFENDANTS, AND EACH OF THEM, DID NEGLIGENTLY AND CARELESSLY OWN, RENT, LEASE, BAIL, OPERATE, CONTROL, REPAIR, MAINTAIN AND ENTRUST THAT CERTAIN 2024 CHEVROLET SILVERADO, BEARING CALIFORNIA LICENSE NUMBER 43441K3, SO AS TO CAUSE THE SAME TO STRIKE AND COLLIDE WITH THAT CERTAIN 2024 LEXUS TX350, BEARING CALIFORNIA LICENSE NUMBER 9RCV294, BEING OPERATED BY PLAINTIFF, DARREN DEVAUGHN PARKS, THEREBY DIRECTLY AND PROXIMATELY CAUSING THE DAMAGES AND INJURIES COMPLAINED OF HEREIN TO PLAINTIFF.

THE FOREGOING NEGLIGENT ACTS AND/OR OMISSIONS ON THE PART OF DEFENDANTS, AND EACH OF THEM, WERE THE DIRECT AND PROXIMATE CAUSE OF THE DAMAGES SUSTAINED BY PLAINTIFF, DARREN DEVAUGHN PARKS.

AS A DIRECT AND PROXIMATE CAUSE OF THE ACTIONS OF DEFENDANTS, AND EACH OF THEM, AS DESCRIBED HEREINABOVE, PLAINTIFF, DARREN DEVAUGHN PARKS, SUSTAINED GENERAL DAMAGES IN AN AMOUNT TO BE DETERMINED AT THE TIME OF TRIAL.

AS DIRECT AND PROXIMATE CAUSE OF THE ACTIONS OF DEFENDANTS, AND EACH OF THEM, AS DESCRIBED HEREINABOVE, PLAINTIFF, DARREN DEVAUGHN PARKS, SUSTAINED SPECIAL DAMAGES, INCLUDING, BUT NOT LIMITED TO WAGE LOSS, LOSS OF EARNING CAPACITY, PROPERTY DAMAGE, LOSS OF USE OF PROPERTY AND PROPERTY USE AND HOSPITAL AND MEDICAL EXPENSES. SAID AMOUNT TO BE PROVEN AT THE TIME OF TRIAL.

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page 5 of 11*(Add pages as required)*

SHORT TITLE: PARKS, et al. v. COUNTY OF KERN, et al.

CASE NUMBER:

26CUB02231

SECOND
(number)**CAUSE OF ACTION—General Negligence**

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ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

GN-1. Plaintiff (name): DARREN DEVAUGHN PARKS, AN INDIVIDUAL

alleges that defendant (name): COUNTY OF KERN; MICHAEL BRANDON BRUMMETT, AN INDIVIDUAL;
AND☒ Does 1 to 100, INCLUSIVEwas the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant negligently caused the damage to plaintiff
on (date): JUNE 20, 2025at (place): OR NEAR 27 FEET NORTH OF HOSKING AVENUE, HIGHWAY 99 SOUTH OFF RAMP TO
HOSKING AVENUE, CITY OF BAKERSFIELD, COUNTY OF KERN, STATE OF CALIFORNIA.
(description of reasons for liability):PLAINTIFF, DARREN DEVAUGHN PARKS, INCORPORATES HEREIN BY REFERENCE EACH AND EVERY
ALLEGATION CONTAINED IN THE FIRST CAUSE OF ACTION OF THIS COMPLAINT FOR DAMAGES AS IF STATED
FULLY HEREIN.AT SAID TIME AND PLACE, DEFENDANT MICHAEL BRANDON BRUMMETT WAS IN THE COURSE AND SCOPE OF
EMPLOYMENT WITH DEFENDANTS COUNTY OF KERN AND DOES 1 TO 100, INCLUSIVE AND DEFENDANTS AND
EACH OF THEM, DID NEGLIGENTLY AND CARELESSLY OWN, RENT, LEASE, BAIL, OPERATE, CONTROL, REPAIR,
MAINTAIN AND ENTRUST THAT 2024 CHEVROLET SILVERADO, BEARING CALIFORNIA LICENSE NUMBER
43441K3, SO AS TO CAUSE THE SAME TO STRIKE AND COLLIDE WITH THAT CERTAIN 2024 LEXUS TX350,
BEARING CALIFORNIA LICENSE NUMBER 9RCV294, BEING OPERATED BY PLAINTIFF, DARREN DEVAUGHN
PARKS, THEREBY DIRECTLY AND PROXIMATELY CAUSING THE DAMAGES AND INJURIES COMPLAINED OF
HEREIN TO PLAINTIFF.THE NEGLIGENCE ON THE PART OF DEFENDANTS, AND EACH OF THEM, IS NOT LIMITED TO THOSE NEGLIGENT
ACTS AND/OR OMISSIONS DESCRIBED ABOVE, BUT ALSO INCLUDES THE NEGLIGENT HIRING, RETAINING,
ENTRUSTING, MONITORING, APPOINTING, SELECTING, TRAINING, AND/OR SUPERVISING OF THOSE PERSONS
RESPONSIBLE FOR THE FOREGOING ACTS AND/OR OMISSIONS.THE FOREGOING NEGLIGENT ACTS AND/OR OMISSIONS ON THE PART OF DEFENDANTS, AND EACH OF THEM,
WERE THE DIRECT AND PROXIMATE CAUSE OF THE DAMAGES SUSTAINED BY PLAINTIFF, DARREN DEVAUGHN
PARKS.AS A DIRECT AND PROXIMATE CAUSE OF THE ACTIONS OF DEFENDANTS, AND EACH OF THEM, AS DESCRIBED
HEREINABOVE, PLAINTIFF, DARREN DEVAUGHN PARKS, SUFFERED SEVERE PHYSICAL INJURIES AND
SUSTAINED GREAT PAIN AND SUFFERING. PLAINTIFF, DARREN DEVAUGHN PARKS, SUSTAINED SPECIAL
DAMAGES, INCLUDING, BUT NOT LIMITED TO WAGE LOSS, LOSS OF EARNING CAPACITY, PROPERTY
DAMAGE, LOSS OF USE OF PROPERTY AND PROPERTY USE AND HOSPITAL AND MEDICAL EXPENSES. SAID
AMOUNT TO BE PROVEN AT THE TIME OF TRIAL.AS A DIRECT AND PROXIMATE CAUSE OF THE ACTIONS OF DEFENDANTS, AND EACH OF THEM, AS DESCRIBED
HEREINABOVE, PLAINTIFF, DARREN DEVAUGHN PARKS, SUUSTAINED GENERAL DAMAGES IN AN AMOUNT TO
BE DETERMINED AT THE TIME OF TRIAL.

SHORT TITLE: PARKS, et al. v. COUNTY OF KERN; et al.

CASE NUMBER:

26CUB02231

THIRD

(number)

CAUSE OF ACTION—General NegligencePage 7ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

GN-1. Plaintiff (name): DARREN DEVAUGHN PARKS, AN INDIVIDUAL

alleges that defendant (name): COUNTY OF KERN; MICHAEL BRANDON BRUMMETT, AN INDIVIDUAL;
AND

☒ Does 1 _____ to 100, INCLUSIVE _____

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant negligently caused the damage to plaintiff

on (date): JUNE 20, 2025

at (place): OR NEAR 27 FEET NORTH OF HOSKING AVENUE, HIGHWAY 99 SOUTH OFF RAMP TO HOSKING AVENUE, CITY OF BAKERSFIELD, COUNTY OF KERN, STATE OF CALIFORNIA.

(description of reasons for liability):

PLAINTIFF, DARREN DEVAUGHN PARKS INCORPORATES HEREIN BY REFERENCE EACH AND EVERY ALLEGATION CONTAINED IN THE FIRST AND SECOND CAUSE OF ACTION OF THIS COMPLAINT FOR DAMAGES AS IF STATED FULLY HEREIN.

ON JUNE 20, 2025, AND AT ALL TIMES MENTIONED IN THIS COMPLAINT FOR DAMAGES, PLAINTIFF, DARREN DEVAUGHN PARKS WAS THE LAWFUL SPOUSE OF PLAINTIFF, CRYSTAL LASSABBRA DAVIS PARKS.

BEFORE SUFFERING THE INJURIES FROM THE SUBJECT INCIDENT, AS MORE FULLY DESCRIBED IN THE FIRST AND SECOND CAUSES OF ACTION OF THIS COMPLAINT FOR DAMAGES, PLAINTIFF, CRYSTAL LASSABBRA DAVIS PARKS WAS ABLE TO AND DID PERFORM ALL THE DUTIES OF A WIFE AND DID PROVIDE LOVE, COMPANIONSHIP, AFFECTION, SOCIETY, SEXUAL RELATIONS, MORAL SUPPORT AND SOLACE TO PLAINTIFF, DARREN DEVAUGHN PARKS.

AS A DIRECT AND PROXIMATE RESULT OF HER INJURIES, PLAINTIFF, CRYSTAL LASSABBRA DAVIS PARKS HAS BEEN UNABLE TO FULLY PERFORM THE DUTIES OF A WIFE AS STATED HEREINABOVE AND PLAINTIFF, DARREN DEVAUGHN PARKS HAS BEEN DEPRIVED OF HIS WIFE'S COMFORT, CARE AND SOCIETY, ALL TO HER DAMAGE, IN AN AMOUNT TO BE DETERMINED AT THE TIME OF TRIAL.

SHORT TITLE: PARKS, et al. v. COUNTY OF KERN, et al

CASE NUMBER:

26CUB02231

FOURTH
(number)

CAUSE OF ACTION—Motor Vehicle

ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

Plaintiff (name): CRYSTAL LASSABBRA DAVIS PARKS, AN INDIVIDUAL

MV- 1. Plaintiff alleges the acts of defendants were negligent; the acts were the legal (proximate) cause of injuries and damages to plaintiff; the acts occurred

on (date): JUNE 20, 2025

at (place): OR NEAR 27 FEET NORTH OF HOSKING AVENUE, HIGHWAY 99 SOUTH OFF RAMP TO
HOSKING AVENUE, CITY OF BAKERSFIELD, COUNTY OF KERN, STATE OF CALIFORNIA.

MV- 2. DEFENDANTS

a. ☒ The defendants who operated a motor vehicle are (names): MICHAEL BRANDON BRUMMETT, AN
INDIVIDUAL; AND☒ Does 1 to 100, INCLUSIVEb. ☒ The defendants who employed the persons who operated a motor vehicle in the course of their employment
are (names): COUNTY OF KERN; AND☒ Does 1 to 100, INCLUSIVEc. ☒ The defendants who owned the motor vehicle which was operated with their permission are (names):
COUNTY OF KERN; AND☒ Does 1 to 100, INCLUSIVEd. ☒ The defendants who entrusted the motor vehicle are (names): COUNTY OF KERN; AND☒ Does 1 to 100, INCLUSIVEe. ☒ The defendants who were the agents and employees of the other defendants and acted within the scope
of the agency were (names): COUNTY OF KERN; MICHAEL BRANDON BRUMMETT, AN
INDIVIDUAL; AND☐ Does tof. ☐ The defendants who are liable to plaintiffs for other reasons and the reasons for the liability are
☐ listed in Attachment MV-2f ☐ as follows:☐ Does to

Page 8

SHORT TITLE: PARKS, et al. v. COUNTY OF KERN, et al

CASE NUMBER:

26CUB02231

ATTACHMENT (Number): MV-1*(This Attachment may be used with any Judicial Council form.)*

AT SAID TIME AND PLACE, DEFENDANTS, AND EACH OF THEM, DID NEGLIGENTLY AND CARELESSLY OWN, RENT, LEASE, BAIL, OPERATE, CONTROL, REPAIR, MAINTAIN AND ENTRUST THAT CERTAIN 2024 CHEVROLET SILVERADO, BEARING CALIFORNIA LICENSE NUMBER 43441K3, SO AS TO CAUSE THE SAME TO STRIKE AND COLLIDE WITH THAT CERTAIN 2024 LEXUS TX350, BEARING CALIFORNIA LICENSE NUMBER 9RCV294, IN WHICH PLAINTIFF, CRYSTAL LASSABBRA DAVIS PARKS WAS A PASSENGER, THEREBY DIRECTLY AND PROXIMATELY CAUSING THE DAMAGES AND INJURIES COMPLAINED OF HEREIN TO PLAINTIFF.

THE FOREGOING NEGLIGENT ACTS AND/OR OMISSIONS ON THE PART OF DEFENDANTS, AND EACH OF THEM, WERE THE DIRECT AND PROXIMATE CAUSE OF THE DAMAGES SUSTAINED BY PLAINTIFF, CRYSTAL LASSABBRA DAVIS PARKS.

AS A DIRECT AND PROXIMATE CAUSE OF THE ACTIONS OF DEFENDANTS, AND EACH OF THEM, AS DESCRIBED HEREINABOVE, PLAINTIFF, CRYSTAL LASSABBRA DAVIS PARKS, SUSTAINED GENERAL DAMAGES IN AN AMOUNT TO BE DETERMINED AT THE TIME OF TRIAL.

AS DIRECT AND PROXIMATE CAUSE OF THE ACTIONS OF DEFENDANTS, AND EACH OF THEM, AS DESCRIBED HEREINABOVE, PLAINTIFF, CRYSTAL LASSABBRA DAVIS PARKS, SUSTAINED SPECIAL DAMAGES, INCLUDING, BUT NOT LIMITED TO WAGE LOSS, LOSS OF EARNING CAPACITY, PROPERTY DAMAGE, LOSS OF USE OF PROPERTY AND PROPERTY USE AND HOSPITAL AND MEDICAL EXPENSES. SAID AMOUNT TO BE PROVEN AT THE TIME OF TRIAL.

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

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(Add pages as required)

SHORT TITLE: PARKS, et al. v. COUNTY OF KERN, et al

CASE NUMBER:

26CUB02231

FIFTH

(number)

CAUSE OF ACTION—General Negligence

Page 10

ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

GN-1. Plaintiff (name): CRYSTAL LASSABBRA DAVIS PARKS, AN INDIVIDUAL

alleges that defendant (name): COUNTY OF KERN; MICHAEL BRANDON BRUMMETT, AN INDIVIDUAL;
AND

☒ Does 1 to 100, INCLUSIVE

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant negligently caused the damage to plaintiff

on (date): JUNE 20, 2025

at (place): OR NEAR 27 FEET NORTH OF HOSKING AVENUE, HIGHWAY 99 SOUTH OFF RAMP TO HOSKING AVENUE, CITY OF BAKERSFIELD, COUNTY OF KERN, STATE OF CALIFORNIA.

(description of reasons for liability):

PLAINTIFF, CRYSTAL LASSABBRA DAVIS PARKS, INCORPORATES HEREIN BY REFERENCE EACH AND EVERY ALLEGATION CONTAINED IN THE FIRST, SECOND, THIRD AND FOURTH CAUSES OF ACTION OF THIS COMPLAINT FOR DAMAGES AS IF STATED FULLY HEREIN.

AT SAID TIME AND PLACE, DEFENDANT MICHAEL BRANDON BRUMMETT WAS IN THE COURSE AND SCOPE OF EMPLOYMENT WITH DEFENDANTS COUNTY OF KERN AND DOES 1 TO 100, INCLUSIVE AND DEFENDANTS AND EACH OF THEM, DID NEGLIGENTLY AND CARELESSLY OWN, RENT, LEASE, BAIL, OPERATE, CONTROL, REPAIR, MAINTAIN AND ENTRUST THAT 2024 CHEVROLET SILVERADO, BEARING CALIFORNIA LICENSE NUMBER 43441K3, SO AS TO CAUSE THE SAME TO STRIKE AND COLLIDE WITH THAT CERTAIN 2024 LEXUS TX350, BEARING CALIFORNIA LICENSE NUMBER 9RCV294, IN WHICH PLAINTIFF, CRYSTAL LASSABBRA DAVIS PARKS WAS A PASSENGER, THEREBY DIRECTLY AND PROXIMATELY CAUSING THE DAMAGES AND INJURIES COMPLAINED OF HEREIN TO PLAINTIFF.

THE NEGLIGENCE ON THE PART OF DEFENDANTS, AND EACH OF THEM, IS NOT LIMITED TO THOSE NEGLIGENT ACTS AND/OR OMISSIONS DESCRIBED ABOVE, BUT ALSO INCLUDES THE NEGLIGENT HIRING, RETAINING, ENTRUSTING, MONITORING, APPOINTING, SELECTING, TRAINING, AND/OR SUPERVISING OF THOSE PERSONS RESPONSIBLE FOR THE FOREGOING ACTS AND/OR OMISSIONS.

THE FOREGOING NEGLIGENT ACTS AND/OR OMISSIONS ON THE PART OF DEFENDANTS, AND EACH OF THEM, WERE THE DIRECT AND PROXIMATE CAUSE OF THE DAMAGES SUSTAINED BY PLAINTIFF, CRYSTAL LASSABBRA DAVIS PARKS.

AS A DIRECT AND PROXIMATE CAUSE OF THE ACTIONS OF DEFENDANTS, AND EACH OF THEM, AS DESCRIBED HEREINABOVE, PLAINTIFF, CRYSTAL LASSABBRA DAVIS PARKS, SUFFERED SEVERE PHYSICAL INJURIES AND SUSTAINED GREAT PAIN AND SUFFERING. PLAINTIFF, CRYSTAL LASSABBRA DAVIS PARKS, SUSTAINED SPECIAL DAMAGES, INCLUDING, BUT NOT LIMITED TO WAGE LOSS, LOSS OF EARNING CAPACITY, PROPERTY DAMAGE, LOSS OF USE OF PROPERTY AND PROPERTY USE AND HOSPITAL AND MEDICAL EXPENSES. SAID AMOUNT TO BE PROVEN AT THE TIME OF TRIAL.

AS A DIRECT AND PROXIMATE CAUSE OF THE ACTIONS OF DEFENDANTS, AND EACH OF THEM, AS DESCRIBED HEREINABOVE, PLAINTIFF, CRYSTAL LASSABBRA DAVIS PARKS, SUUSTAINED GENERAL DAMAGES IN AN AMOUNT TO BE DETERMINED AT THE TIME OF TRIAL.

SHORT TITLE: PARKS, et al. v. COUNTY OF KERN, et al.

CASE NUMBER:

26CUB02231

SIXTH

(number)

CAUSE OF ACTION—General NegligencePage 11ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

GN-1. Plaintiff (name): CRYSTAL LASSABBRA DAVIS PARKS, AN INDIVIDUAL

alleges that defendant (name): COUNTY OF KERN; MICHAEL BRANDON BRUMMETT, AN INDIVIDUAL;
AND

☒ Does 1 to 100, INCLUSIVE

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant negligently caused the damage to plaintiff

on (date): JUNE 20, 2025

at (place): OR NEAR 27 FEET NORTH OF HOSKING AVENUE, HIGHWAY 99 SOUTH OFF RAMP TO HOSKING AVENUE, CITY OF BAKERSFIELD, COUNTY OF KERN, STATE OF CALIFORNIA.

(description of reasons for liability):

PLAINTIFF, CRYSTAL LASSABBRA DAVIS PARKS INCORPORATED HEREIN BY REFERENCE EACH AND EVERY ALLEGATION CONTAINED IN THE FIRST, SECOND, THIRD, FOURTH AND FIFTH CAUSES OF ACTION OF THIS COMPLAINT FOR DAMAGES AS IF STATED FULLY HEREIN.

ON JUNE 20, 2025, AND AT ALL TIMES MENTIONED IN THIS COMPLAINT FOR DAMAGES, PLAINTIFF, DARREN DEVAUGHN PARKS WAS THE LAWFUL SPOUSE OF PLAINTIFF CRYSTAL LASSABBRA DAVIS PARKS.

BEFORE SUFFERING THE INJURIES FROM THE SUBJECT INCIDENT, AS MORE FULLY DESCRIBED IN THE FIRST AND SECOND CAUSES OF ACTION OF THIS COMPLAINT FOR DAMAGES, PLAINTIFF DARREN DEVAUGHN PARKS WAS ABLE TO AND DID PERFORM ALL THE DUTIES OF A HUSBAND AND DID PERFORM ALL THESE DUTIES, INCLUDING, ASSISTING IN MAINTAINING THE FAMILY HOME, AND PROVIDING LOVE, COMPANIONSHIP, AFFECTION, SOCIETY, SEXUAL RELATIONS, MORAL SUPPORT AND SOLACE TO PLAINTIFF, CRYSTAL LASSABBRA DAVIS PARKS.

AS A DIRECT AND PROXIMATE RESULT OF HIS INJURIES, PLAINTIFF, DARREN DEVAUGHN PARKS HAS BEEN UNABLE TO FULLY PERFORM THE DUTIES OF A HUSBAND AS STATED HEREINABOVE AND PLAINTIFF CRYSTAL LASSABBRA DAVIS PARKS HAS BEEN DEPRIVED OF HER HUSBAND'S COMFORT, CARE AND SOCIETY, ALL TO HER DAMAGE, IN AN AMOUNT TO BE DETERMINED AT THE TIME OF TRIAL.

1. **Plaintiff (name or names):** DARREN DEVAUGHN PARKS, AN INDIVIDUAL; CRYSTAL LASSABRA DAVIS PARKS, AN INDIVIDUAL
alleges causes of action against **defendant (name or names):** COUNTY OF KERN; MICHAEL BRANDON BRUMMETT, AN
INDIVIDUAL and DOES 1 TO 100, INCLUSIVE
2. This pleading, including attachments and exhibits, consists of the following number of pages:
3. Each plaintiff named above is a competent adult
- a. ☐ **except plaintiff (name):**
- (1) ☐ a corporation qualified to do business in California.
- (2) ☐ an unincorporated entity (*describe*):
- (3) ☐ a public entity (*describe*):
- (4) ☐ a minor ☐ an adult
- (a) ☐ for whom a guardian or conservator of the estate or a guardian ad litem has been appointed.
- (b) ☐ other (*specify*):
- (5) ☐ other (*specify*):
- b. ☐ **except plaintiff (name):**
- (1) ☐ a corporation qualified to do business in California.
- (2) ☐ an unincorporated entity (*describe*):
- (3) ☐ a public entity (*describe*):
- (4) ☐ a minor ☐ an adult
- (a) ☐ for whom a guardian or conservator of the estate or a guardian ad litem has been appointed.
- (b) ☐ other (*specify*):
- (5) ☐ other (*specify*):
- ☐ Information about additional plaintiffs who are not competent adults is shown in Attachment 3.

☐ Information about additional plaintiffs who are not competent adults is shown in Attachment 3.

SHORT TITLE: PARKS, et al. v. COUNTY OF KERN, et al.

CASE NUMBER:

26CUB02231

4. ☐ Plaintiff (name):
is doing business under the fictitious name (specify):

and has complied with the fictitious business name laws.

5. Each defendant named above is a natural person

- a. ☒ except defendant (name): Does 1 to 15, Inclusive

(1) ☒ a business organization, form unknown.

(2) ☐ a corporation.

(3) ☐ an unincorporated entity (describe):

(4) ☐ a public entity (describe):

(5) ☐ other (specify):

- c. ☒ except defendant (name): Does 31 to 45, Inclusive

(1) ☐ a business organization, form unknown.

(2) ☐ a corporation.

(3) ☒ an unincorporated entity (describe):

(4) ☐ a public entity (describe):

(5) ☐ other (specify):

County of Kern and

- b. ☒ except defendant (name): Does 16 to 30, Inclusive

(1) ☐ a business organization, form unknown.

(2) ☒ a corporation.

(3) ☐ an unincorporated entity (describe):

(4) ☐ a public entity (describe):

(5) ☐ other (specify):

- d. ☒ except defendant (name): Does 46 to 60, Inclusive

(1) ☐ a business organization, form unknown.

(2) ☐ a corporation.

(3) ☐ an unincorporated entity (describe):

(4) ☒ a public entity (describe):

GOVERNMENT AGENCY - COUNTY

(5) ☐ other (specify):

☐ Information about additional defendants who are not natural persons is contained in Attachment 5.

6. The true names of defendants sued as Does are unknown to plaintiff.

- a. ☒ Doe defendants (specify Doe numbers): 1 TO 100, INCLUSIVE

named defendants and acted within the scope of that agency or employment.

were the agents or employees of other

- b. ☒ Doe defendants (specify Doe numbers): 1 TO 100, INCLUSIVE

plaintiff.

are persons whose capacities are unknown to

7. ☐ Defendants who are joined under Code of Civil Procedure section 382 are (names):

8. This court is the proper court because

a. ☒ at least one defendant now resides in its jurisdictional area.

b. ☐ the principal place of business of a defendant corporation or unincorporated association is in its jurisdictional area.

c. ☒ injury to person or damage to personal property occurred in its jurisdictional area.

d. ☐ other (specify):

9. ☒ Plaintiff is required to comply with a claims statute, and

a. ☒ has complied with applicable claims statutes, or

b. ☐ is excused from complying because (specify):

SHORT TITLE: PARKS, et al. v. COUNTY OF KERN, et al.

CASE NUMBER:

26CUB02231

10. The following causes of action are attached and the statements above apply to each (each complaint must have one or more causes of action attached):

- a. ☒ Motor Vehicle
- b. ☒ General Negligence
- c. ☐ Intentional Tort
- d. ☐ Products Liability
- e. ☐ Premises Liability
- f. ☒ Other (specify): GENERAL NEGLIGENCE; LOSS OF CONSORTIUM.

11. Plaintiff has suffered (check all that apply)

- a. ☒ wage loss.
- b. ☒ loss of use of property.
- c. ☒ hospital and medical expenses.
- d. ☒ general damage.
- e. ☒ property damage.
- f. ☒ loss of earning capacity.
- g. ☒ other damage (specify): LOSS OF CONSORTIUM.

12. ☐ The damages claimed for wrongful death and the relationships of plaintiff to the deceased are

- a. ☐ listed in Attachment 12.
- b. ☐ as follows:

13. The relief sought in this complaint is within the jurisdiction of this court.

14. Plaintiff prays for judgment for costs of suit; for such relief as is fair, just, and equitable; and for

- a. (1) ☒ compensatory damages.
- (2) ☐ punitive damages.
- b. The amount of damages is (in cases for personal injury or wrongful death, you must check (1)):
- (1) ☒ according to proof.
- (2) ☐ in the amount of: \$

15. ☒ The paragraphs of this complaint alleged on information and belief are as follows (specify paragraph numbers): AT ALL TIMES MENTIONED HEREIN, DEFENDANTS AND EACH OF THEM, WERE THE AGENTS AND EMPLOYEES OF EACH OF THE REMAINING DEFENDANTS, AND ACTED WITHIN THE COURSE AND SCOPE OF SUCH AGENCY AND EMPLOYMENT.

Date: JUNE 9, 2026

CURTIS E. FLOYD, ESQ.

(TYPE OR PRINT NAME)

(SIGNATURE OF PLAINTIFF OR ATTORNEY)

SHORT TITLE: PARKS, et al. v. COUNTY OF KERN, et al.

CASE NUMBER:

26CUB02231

FIRST
(number)**CAUSE OF ACTION—Motor Vehicle**ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

Plaintiff (name): DARREN DEVAUGHN PARKS, AN INDIVIDUAL

MV- 1. Plaintiff alleges the acts of defendants were negligent; the acts were the legal (proximate) cause of injuries and damages to plaintiff; the acts occurred

on (date): JUNE 20, 2025

at (place): OR NEAR 27 FEET NORTH OF HOSKING AVENUE, HIGHWAY 99 SOUTH OFF RAMP TO HOSKING AVENUE, CITY OF BAKERSFIELD, COUNTY OF KERN, STATE OF CALIFORNIA.

MV- 2. DEFENDANTS

a. ☒ The defendants who operated a motor vehicle are (names): MICHAEL BRANDON BRUMMETT, AN INDIVIDUAL; AND☒ Does 1 to 100, INCLUSIVEb. ☒ The defendants who employed the persons who operated a motor vehicle in the course of their employment are (names): COUNTY OF KERN; AND☒ Does 1 to 100, INCLUSIVEc. ☒ The defendants who owned the motor vehicle which was operated with their permission are (names): COUNTY OF KERN; AND☒ Does 1 to 100, INCLUSIVEd. ☒ The defendants who entrusted the motor vehicle are (names): COUNTY OF KERN; AND☒ Does 1 to 100, INCLUSIVEe. ☒ The defendants who were the agents and employees of the other defendants and acted within the scope of the agency were (names): COUNTY OF KERN; MICHAEL BRANDON BRUMMETT, AN INDIVIDUAL; AND☒ Does 1 to 100, INCLUSIVEf. ☐ The defendants who are liable to plaintiffs for other reasons and the reasons for the liability are ☐ listed in Attachment MV-2f ☐ as follows:☐ Does _____ to _____

Page 4 _____

SHORT TITLE: PARKS, et al. v. COUNTY OF KERN, et al.

CASE NUMBER:

26CUB02231

ATTACHMENT (Number): MV-1*(This Attachment may be used with any Judicial Council form.)*

AT SAID TIME AND PLACE, DEFENDANTS, AND EACH OF THEM, DID NEGLIGENTLY AND CARELESSLY OWN, RENT, LEASE, BAIL, OPERATE, CONTROL, REPAIR, MAINTAIN AND ENTRUST THAT CERTAIN 2024 CHEVROLET SILVERADO, BEARING CALIFORNIA LICENSE NUMBER 43441K3, SO AS TO CAUSE THE SAME TO STRIKE AND COLLIDE WITH THAT CERTAIN 2024 LEXUS TX350, BEARING CALIFORNIA LICENSE NUMBER 9RCV294, BEING OPERATED BY PLAINTIFF, DARREN DEVAUGHN PARKS, THEREBY DIRECTLY AND PROXIMATELY CAUSING THE DAMAGES AND INJURIES COMPLAINED OF HEREIN TO PLAINTIFF.

THE FOREGOING NEGLIGENT ACTS AND/OR OMISSIONS ON THE PART OF DEFENDANTS, AND EACH OF THEM, WERE THE DIRECT AND PROXIMATE CAUSE OF THE DAMAGES SUSTAINED BY PLAINTIFF, DARREN DEVAUGHN PARKS.

AS A DIRECT AND PROXIMATE CAUSE OF THE ACTIONS OF DEFENDANTS, AND EACH OF THEM, AS DESCRIBED HEREINABOVE, PLAINTIFF, DARREN DEVAUGHN PARKS, SUSTAINED GENERAL DAMAGES IN AN AMOUNT TO BE DETERMINED AT THE TIME OF TRIAL.

AS DIRECT AND PROXIMATE CAUSE OF THE ACTIONS OF DEFENDANTS, AND EACH OF THEM, AS DESCRIBED HEREINABOVE, PLAINTIFF, DARREN DEVAUGHN PARKS, SUSTAINED SPECIAL DAMAGES, INCLUDING, BUT NOT LIMITED TO WAGE LOSS, LOSS OF EARNING CAPACITY, PROPERTY DAMAGE, LOSS OF USE OF PROPERTY AND PROPERTY USE AND HOSPITAL AND MEDICAL EXPENSES. SAID AMOUNT TO BE PROVEN AT THE TIME OF TRIAL.

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page 5 of 11*(Add pages as required)*

SHORT TITLE: PARKS, et al. v. COUNTY OF KERN, et al.

CASE NUMBER:

26CUB02231

SECOND
(number)**CAUSE OF ACTION—General Negligence**

Page 6

ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

GN-1. Plaintiff (name): DARREN DEVAUGHN PARKS, AN INDIVIDUAL

alleges that defendant (name): COUNTY OF KERN; MICHAEL BRANDON BRUMMETT, AN INDIVIDUAL;
AND☒ Does 1 to 100, INCLUSIVE

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant negligently caused the damage to plaintiff

on (date): JUNE 20, 2025

at (place): OR NEAR 27 FEET NORTH OF HOSKING AVENUE, HIGHWAY 99 SOUTH OFF RAMP TO HOSKING AVENUE, CITY OF BAKERSFIELD, COUNTY OF KERN, STATE OF CALIFORNIA.

(description of reasons for liability):

PLAINTIFF, DARREN DEVAUGHN PARKS, INCORPORATES HEREIN BY REFERENCE EACH AND EVERY ALLEGATION CONTAINED IN THE FIRST CAUSE OF ACTION OF THIS COMPLAINT FOR DAMAGES AS IF STATED FULLY HEREIN.

AT SAID TIME AND PLACE, DEFENDANT MICHAEL BRANDON BRUMMETT WAS IN THE COURSE AND SCOPE OF EMPLOYMENT WITH DEFENDANTS COUNTY OF KERN AND DOES 1 TO 100, INCLUSIVE AND DEFENDANTS AND EACH OF THEM, DID NEGLIGENTLY AND CARELESSLY OWN, RENT, LEASE, BAIL, OPERATE, CONTROL, REPAIR, MAINTAIN AND ENTRUST THAT 2024 CHEVROLET SILVERADO, BEARING CALIFORNIA LICENSE NUMBER 43441K3, SO AS TO CAUSE THE SAME TO STRIKE AND COLLIDE WITH THAT CERTAIN 2024 LEXUS TX350, BEARING CALIFORNIA LICENSE NUMBER 9RCV294, BEING OPERATED BY PLAINTIFF, DARREN DEVAUGHN PARKS, THEREBY DIRECTLY AND PROXIMATELY CAUSING THE DAMAGES AND INJURIES COMPLAINED OF HEREIN TO PLAINTIFF.

THE NEGLIGENCE ON THE PART OF DEFENDANTS, AND EACH OF THEM, IS NOT LIMITED TO THOSE NEGLIGENT ACTS AND/OR OMISSIONS DESCRIBED ABOVE, BUT ALSO INCLUDES THE NEGLIGENT HIRING, RETAINING, ENTRUSTING, MONITORING, APPOINTING, SELECTING, TRAINING, AND/OR SUPERVISING OF THOSE PERSONS RESPONSIBLE FOR THE FOREGOING ACTS AND/OR OMISSIONS.

THE FOREGOING NEGLIGENT ACTS AND/OR OMISSIONS ON THE PART OF DEFENDANTS, AND EACH OF THEM, WERE THE DIRECT AND PROXIMATE CAUSE OF THE DAMAGES SUSTAINED BY PLAINTIFF, DARREN DEVAUGHN PARKS.

AS A DIRECT AND PROXIMATE CAUSE OF THE ACTIONS OF DEFENDANTS, AND EACH OF THEM, AS DESCRIBED HEREINABOVE, PLAINTIFF, DARREN DEVAUGHN PARKS, SUFFERED SEVERE PHYSICAL INJURIES AND SUSTAINED GREAT PAIN AND SUFFERING. PLAINTIFF, DARREN DEVAUGHN PARKS, SUSTAINED SPECIAL DAMAGES, INCLUDING, BUT NOT LIMITED TO WAGE LOSS, LOSS OF EARNING CAPACITY, PROPERTY DAMAGE, LOSS OF USE OF PROPERTY AND PROPERTY USE AND HOSPITAL AND MEDICAL EXPENSES. SAID AMOUNT TO BE PROVEN AT THE TIME OF TRIAL.

AS A DIRECT AND PROXIMATE CAUSE OF THE ACTIONS OF DEFENDANTS, AND EACH OF THEM, AS DESCRIBED HEREINABOVE, PLAINTIFF, DARREN DEVAUGHN PARKS, SUUSTAINED GENERAL DAMAGES IN AN AMOUNT TO BE DETERMINED AT THE TIME OF TRIAL.

SHORT TITLE: PARKS, et al. v. COUNTY OF KERN; et al.

CASE NUMBER:

26CUB02231

THIRD

(number)

CAUSE OF ACTION—General Negligence

Page 7

ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

GN-1. Plaintiff (name): DARREN DEVAUGHN PARKS, AN INDIVIDUAL

alleges that defendant (name): COUNTY OF KERN; MICHAEL BRANDON BRUMMETT, AN INDIVIDUAL;
AND☒ Does 1 to 100 INCLUSIVE

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant negligently caused the damage to plaintiff

on (date): JUNE 20, 2025

at (place): OR NEAR 27 FEET NORTH OF HOSKING AVENUE, HIGHWAY 99 SOUTH OFF RAMP TO HOSKING AVENUE, CITY OF BAKERSFIELD, COUNTY OF KERN, STATE OF CALIFORNIA.

(description of reasons for liability):

PLAINTIFF, DARREN DEVAUGHN PARKS INCORPORATES HEREIN BY REFERENCE EACH AND EVERY ALLEGATION CONTAINED IN THE FIRST AND SECOND CAUSE OF ACTION OF THIS COMPLAINT FOR DAMAGES AS IF STATED FULLY HEREIN.

ON JUNE 20, 2025, AND AT ALL TIMES MENTIONED IN THIS COMPLAINT FOR DAMAGES, PLAINTIFF, DARREN DEVAUGHN PARKS WAS THE LAWFUL SPOUSE OF PLAINTIFF, CRYSTAL LASSABBRA DAVIS PARKS.

BEFORE SUFFERING THE INJURIES FROM THE SUBJECT INCIDENT, AS MORE FULLY DESCRIBED IN THE FIRST AND SECOND CAUSES OF ACTION OF THIS COMPLAINT FOR DAMAGES, PLAINTIFF, CRYSTAL LASSABBRA DAVIS PARKS WAS ABLE TO AND DID PERFORM ALL THE DUTIES OF A WIFE AND DID PROVIDE LOVE, COMPANIONSHIP, AFFECTION, SOCIETY, SEXUAL RELATIONS, MORAL SUPPORT AND SOLACE TO PLAINTIFF, DARREN DEVAUGHN PARKS.

AS A DIRECT AND PROXIMATE RESULT OF HER INJURIES, PLAINTIFF, CRYSTAL LASSABBRA DAVIS PARKS HAS BEEN UNABLE TO FULLY PERFORM THE DUTIES OF A WIFE AS STATED HEREINABOVE AND PLAINTIFF, DARREN DEVAUGHN PARKS HAS BEEN DEPRIVED OF HIS WIFE'S COMFORT, CARE AND SOCIETY, ALL TO HER DAMAGE, IN AN AMOUNT TO BE DETERMINED AT THE TIME OF TRIAL.

SHORT TITLE: PARKS, et al. v. COUNTY OF KERN, et al

CASE NUMBER:

26CUB02231

FOURTH
(number)

CAUSE OF ACTION—Motor Vehicle

ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

Plaintiff (name): CRYSTAL LASSABBRA DAVIS PARKS, AN INDIVIDUAL

MV- 1. Plaintiff alleges the acts of defendants were negligent; the acts were the legal (proximate) cause of injuries and damages to plaintiff; the acts occurred

on (date): JUNE 20, 2025

at (place): OR NEAR 27 FEET NORTH OF HOSKING AVENUE, HIGHWAY 99 SOUTH OFF RAMP TO HOSKING AVENUE, CITY OF BAKERSFIELD, COUNTY OF KERN, STATE OF CALIFORNIA.

MV- 2. DEFENDANTS

a. ☒ The defendants who operated a motor vehicle are (names): MICHAEL BRANDON BRUMMETT, AN INDIVIDUAL; AND☒ Does 1 _____ to 100, INCLUSIVEb. ☒ The defendants who employed the persons who operated a motor vehicle in the course of their employment are (names): COUNTY OF KERN; AND☒ Does 1 _____ to 100, INCLUSIVEc. ☒ The defendants who owned the motor vehicle which was operated with their permission are (names): COUNTY OF KERN; AND☒ Does 1 _____ to 100, INCLUSIVEd. ☒ The defendants who entrusted the motor vehicle are (names): COUNTY OF KERN; AND☒ Does 1 _____ to 100, INCLUSIVEe. ☒ The defendants who were the agents and employees of the other defendants and acted within the scope of the agency were (names): COUNTY OF KERN; MICHAEL BRANDON BRUMMETT, AN INDIVIDUAL; AND☐ Does _____ to _____f. ☐ The defendants who are liable to plaintiffs for other reasons and the reasons for the liability are ☐ listed in Attachment MV-2f ☐ as follows:☐ Does _____ to _____

Page 8

SHORT TITLE: PARKS, et al. v. COUNTY OF KERN, et al

CASE NUMBER:

26CUB02231

ATTACHMENT (Number): MV-1*(This Attachment may be used with any Judicial Council form.)*

AT SAID TIME AND PLACE, DEFENDANTS, AND EACH OF THEM, DID NEGLIGENTLY AND CARELESSLY OWN, RENT, LEASE, BAIL, OPERATE, CONTROL, REPAIR, MAINTAIN AND ENTRUST THAT CERTAIN 2024 CHEVROLET SILVERADO, BEARING CALIFORNIA LICENSE NUMBER 43441K3, SO AS TO CAUSE THE SAME TO STRIKE AND COLLIDE WITH THAT CERTAIN 2024 LEXUS TX350, BEARING CALIFORNIA LICENSE NUMBER 9RCV294, IN WHICH PLAINTIFF, CRYSTAL LASSABBRA DAVIS PARKS WAS A PASSENGER, THEREBY DIRECTLY AND PROXIMATELY CAUSING THE DAMAGES AND INJURIES COMPLAINED OF HEREIN TO PLAINTIFF.

THE FOREGOING NEGLIGENT ACTS AND/OR OMISSIONS ON THE PART OF DEFENDANTS, AND EACH OF THEM, WERE THE DIRECT AND PROXIMATE CAUSE OF THE DAMAGES SUSTAINED BY PLAINTIFF, CRYSTAL LASSABBRA DAVIS PARKS.

AS A DIRECT AND PROXIMATE CAUSE OF THE ACTIONS OF DEFENDANTS, AND EACH OF THEM, AS DESCRIBED HEREINABOVE, PLAINTIFF, CRYSTAL LASSABBRA DAVIS PARKS, SUSTAINED GENERAL DAMAGES IN AN AMOUNT TO BE DETERMINED AT THE TIME OF TRIAL.

AS DIRECT AND PROXIMATE CAUSE OF THE ACTIONS OF DEFENDANTS, AND EACH OF THEM, AS DESCRIBED HEREINABOVE, PLAINTIFF, CRYSTAL LASSABBRA DAVIS PARKS, SUSTAINED SPECIAL DAMAGES, INCLUDING, BUT NOT LIMITED TO WAGE LOSS, LOSS OF EARNING CAPACITY, PROPERTY DAMAGE, LOSS OF USE OF PROPERTY AND PROPERTY USE AND HOSPITAL AND MEDICAL EXPENSES. SAID AMOUNT TO BE PROVEN AT THE TIME OF TRIAL.

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page 9 of 11*(Add pages as required)*

SHORT TITLE: PARKS, et al. v. COUNTY OF KERN, et al

CASE NUMBER:

26CUB02231

FIFTH

(number)

CAUSE OF ACTION—General Negligence

Page 10

ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

GN-1. Plaintiff (name): CRYSTAL LASSABBRA DAVIS PARKS, AN INDIVIDUAL

alleges that defendant (name): COUNTY OF KERN; MICHAEL BRANDON BRUMMETT, AN INDIVIDUAL;
AND

☒ Does 1 to 100, INCLUSIVE

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant negligently caused the damage to plaintiff

on (date): JUNE 20, 2025

at (place): OR NEAR 27 FEET NORTH OF HOSKING AVENUE, HIGHWAY 99 SOUTH OFF RAMP TO HOSKING AVENUE, CITY OF BAKERSFIELD, COUNTY OF KERN, STATE OF CALIFORNIA.
(description of reasons for liability):

PLAINTIFF, CRYSTAL LASSABBRA DAVIS PARKS, INCORPORATES HEREIN BY REFERENCE EACH AND EVERY ALLEGATION CONTAINED IN THE FIRST, SECOND, THIRD AND FOURTH CAUSES OF ACTION OF THIS COMPLAINT FOR DAMAGES AS IF STATED FULLY HEREIN.

AT SAID TIME AND PLACE, DEFENDANT MICHAEL BRANDON BRUMMETT WAS IN THE COURSE AND SCOPE OF EMPLOYMENT WITH DEFENDANTS COUNTY OF KERN AND DOES 1 TO 100, INCLUSIVE AND DEFENDANTS AND EACH OF THEM, DID NEGLIGENTLY AND CARELESSLY OWN, RENT, LEASE, BAIL, OPERATE, CONTROL, REPAIR, MAINTAIN AND ENTRUST THAT 2024 CHEVROLET SILVERADO, BEARING CALIFORNIA LICENSE NUMBER 43441K3, SO AS TO CAUSE THE SAME TO STRIKE AND COLLIDE WITH THAT CERTAIN 2024 LEXUS TX350, BEARING CALIFORNIA LICENSE NUMBER 9RCV294, IN WHICH PLAINTIFF, CRYSTAL LASSABBRA DAVIS PARKS WAS A PASSENGER, THEREBY DIRECTLY AND PROXIMATELY CAUSING THE DAMAGES AND INJURIES COMPLAINED OF HEREIN TO PLAINTIFF.

THE NEGLIGENCE ON THE PART OF DEFENDANTS, AND EACH OF THEM, IS NOT LIMITED TO THOSE NEGLIGENT ACTS AND/OR OMISSIONS DESCRIBED ABOVE, BUT ALSO INCLUDES THE NEGLIGENT HIRING, RETAINING, ENTRUSTING, MONITORING, APPOINTING, SELECTING, TRAINING, AND/OR SUPERVISING OF THOSE PERSONS RESPONSIBLE FOR THE FOREGOING ACTS AND/OR OMISSIONS.

THE FOREGOING NEGLIGENT ACTS AND/OR OMISSIONS ON THE PART OF DEFENDANTS, AND EACH OF THEM, WERE THE DIRECT AND PROXIMATE CAUSE OF THE DAMAGES SUSTAINED BY PLAINTIFF, CRYSTAL LASSABBRA DAVIS PARKS.

AS A DIRECT AND PROXIMATE CAUSE OF THE ACTIONS OF DEFENDANTS, AND EACH OF THEM, AS DESCRIBED HEREINABOVE, PLAINTIFF, CRYSTAL LASSABBRA DAVIS PARKS, SUFFERED SEVERE PHYSICAL INJURIES AND SUSTAINED GREAT PAIN AND SUFFERING. PLAINTIFF, CRYSTAL LASSABBRA DAVIS PARKS, SUSTAINED SPECIAL DAMAGES, INCLUDING, BUT NOT LIMITED TO WAGE LOSS, LOSS OF EARNING CAPACITY, PROPERTY DAMAGE, LOSS OF USE OF PROPERTY AND PROPERTY USE AND HOSPITAL AND MEDICAL EXPENSES. SAID AMOUNT TO BE PROVEN AT THE TIME OF TRIAL.

AS A DIRECT AND PROXIMATE CAUSE OF THE ACTIONS OF DEFENDANTS, AND EACH OF THEM, AS DESCRIBED HEREINABOVE, PLAINTIFF, CRYSTAL LASSABBRA DAVIS PARKS, SUUSTAINED GENERAL DAMAGES IN AN AMOUNT TO BE DETERMINED AT THE TIME OF TRIAL.

SHORT TITLE: PARKS, et al. v. COUNTY OF KERN, et al.

CASE NUMBER:

26CUB02231

SIXTH

(number)

CAUSE OF ACTION—General NegligencePage 11ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

GN-1. Plaintiff (name): CRYSTAL LASSABBRA DAVIS PARKS, AN INDIVIDUAL

alleges that defendant (name): COUNTY OF KERN; MICHAEL BRANDON BRUMMETT, AN INDIVIDUAL;
AND

☒ Does 1 to 100, INCLUSIVE

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant negligently caused the damage to plaintiff

on (date): JUNE 20, 2025

at (place): OR NEAR 27 FEET NORTH OF HOSKING AVENUE, HIGHWAY 99 SOUTH OFF RAMP TO HOSKING AVENUE, CITY OF BAKERSFIELD, COUNTY OF KERN, STATE OF CALIFORNIA.

(description of reasons for liability):

PLAINTIFF, CRYSTAL LASSABBRA DAVIS PARKS INCORPORATED HEREIN BY REFERENCE EACH AND EVERY ALLEGATION CONTAINED IN THE FIRST, SECOND, THIRD, FOURTH AND FIFTH CAUSES OF ACTION OF THIS COMPLAINT FOR DAMAGES AS IF STATED FULLY HEREIN.

ON JUNE 20, 2025, AND AT ALL TIMES MENTIONED IN THIS COMPLAINT FOR DAMAGES, PLAINTIFF, DARREN DEVAUGHN PARKS WAS THE LAWFUL SPOUSE OF PLAINTIFF CRYSTAL LASSABBRA DAVIS PARKS.

BEFORE SUFFERING THE INJURIES FROM THE SUBJECT INCIDENT, AS MORE FULLY DESCRIBED IN THE FIRST AND SECOND CAUSES OF ACTION OF THIS COMPLAINT FOR DAMAGES, PLAINTIFF DARREN DEVAUGHN PARKS WAS ABLE TO AND DID PERFORM ALL THE DUTIES OF A HUSBAND AND DID PERFORM ALL THESE DUTIES, INCLUDING, ASSISTING IN MAINTAINING THE FAMILY HOME, AND PROVIDING LOVE, COMPANIONSHIP, AFFECTION, SOCIETY, SEXUAL RELATIONS, MORAL SUPPORT AND SOLACE TO PLAINTIFF, CRYSTAL LASSABBRA DAVIS PARKS.

AS A DIRECT AND PROXIMATE RESULT OF HIS INJURIES, PLAINTIFF, DARREN DEVAUGHN PARKS HAS BEEN UNABLE TO FULLY PERFORM THE DUTIES OF A HUSBAND AS STATED HEREINABOVE AND PLAINTIFF CRYSTAL LASSABBRA DAVIS PARKS HAS BEEN DEPRIVED OF HER HUSBAND'S COMFORT, CARE AND SOCIETY, ALL TO HER DAMAGE, IN AN AMOUNT TO BE DETERMINED AT THE TIME OF TRIAL.

26 AUG 20 PM 2:51

FILED IN THE CLERK OF
THE DISTRICT COURT
BY DEPUTY

FIRST-CLASS



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