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FILED WITH CLERK OF
THE BOARD OF SUPERVISORS
BY

1 MATTHEW C. CLARK, SBN 218784
2 TANYA D. ALSHEIKH, SBN 315769
3 CHAIN | COHN | CLARK
4 1731 Chester Avenue
5 Bakersfield, CA 93301
6 E-Mail: mclark@chainlaw.com
7 E-Mail: talsheikh@chainlaw.com
8 Telephone: (661) 323-4000
9 Facsimile: (661) 324-1352

BY ORDER OF THE BD/SUPV
Referred To _____
County Counsel
pgs
Rec'd County Counsel
Copies Furnished _____
Risk Management
Date 10-7-26
Clerk of the Board of Supervisors
By _____, Deputy

7 Attorneys for Claimant

9 In the matter of the claim of:

11 Daniel Paul Ramos,
12 Claimant,
13 v.
14 County of Kern,
15 Respondent.

**CLAIM FOR PERSONAL INJURIES
AND DAMAGES**

[Government Code § 910, et seq.]

16 **TO THE CLERK OF THE BOARD OF SUPERVISORS OF THE COUNTY OF**
17 **KERN:**

18 This claim is being brought pursuant to *Government Code* § 910 et seq., and all other
19 pertinent code sections of the codes, statutes, and laws of the State of California.

20 **A. The name and address of Claimant:**

21 Daniel Paul Ramos
22 1904 Esther Drive
23 Bakersfield, CA 93308

24 **B. The post office address to which Claimant wants all notices to be sent:**

25 Matthew C. Clark, Esq.
26 Tanya D. Alsheikh, Esq.
27 CHAIN | COHN | CLARK
1731 Chester Avenue
Bakersfield, CA 93301

1 **C. The date, place, and other circumstances giving rise to these claims are as**
2 **follows:**

3 **DATE:** On or about June 15, 2026, at approximately 8:30 p.m.

4 **PLACE:** On the Airport Drive Frontage Road, near its intersection with Ann Arbor
5 Drive, in the unincorporated area of Kern County, Bakersfield, California
6 93308.

7 **CIRCUMSTANCES:**

8 **CLAIMED DAMAGES:**

- 9 1. Economic Damages
10 2. Non-Economic Damages
11 3. Reasonable costs of this claim
12 4. Interest as provided by law

13 **CLAIMS AGAINST:**

14 County of Kern;
15 County of Kern employees whose names are currently unknown

16 **WITNESSES:**

17 Claimant, Daniel Paul Ramos, who may be contacted through counsel;
18 Claimant's wife, Brandy Ramos, who may be contacted through counsel;
19 County of Kern employees (names currently unknown);
20 Healthcare providers at Mercy Hospital, Kaiser Permanente, and Adventist Health
21 (names currently unknown); and
22 other unknown individuals who were present at or near the scene at or near the time
23 of the subject incident.

24 **D. Statement of Facts:**

25 On or about June 15, 2026, at approximately 8:30 p.m., Claimant Daniel Paul Ramos
26 (hereinafter "Claimant") was riding his bicycle home, traveling southbound on the Airport Drive
27 Frontage Road toward Ann Arbor Drive, in the unincorporated area of Kern County, California.

28 As Claimant approached Ann Arbor Drive, he prepared to turn left onto Ann Arbor Drive.
 Claimant looked for oncoming traffic and began his turn. While Claimant's attention was properly
 directed toward oncoming traffic, his bicycle entered a pothole in the roadway. The pothole caused
 Claimant to lose control of his bicycle, and he was thrown over the handlebars and onto the

1 roadway, landing on his left side. The pothole was located where the Airport Drive Frontage Road
2 meets the intersection, adjacent to the curbed island separating the frontage road from the travel
3 lanes of Airport Drive, and directly within the path of travel of vehicles and bicycles turning from
4 the frontage road. A photograph of the pothole and the surrounding roadway is attached hereto as
5 **Exhibit A.**

6 As a result of the fall, Claimant sustained serious personal injuries, including but not
7 limited to, a fractured left clavicle, abrasions to his head, and injuries to his left knee and left
8 shoulder. Claimant was treated at the emergency department at Mercy Hospital, and he has since
9 undergone surgery and continues to receive medical care. Claimant's injuries have prevented him
10 from working, and he has suffered, and continues to suffer, a loss of earnings. Claimant's bicycle
11 and cellular phone were also damaged in the fall.

12 Claimant is informed and believes that the roadway on which the pothole existed was
13 owned, leased, maintained, operated, supervised, or otherwise controlled by the County of Kern.
14 Claimant contends that the subject roadway was not properly constructed, inspected, maintained,
15 repaired, and/or controlled, and as such it constituted a dangerous condition of public property and
16 a substantial risk of injury to members of the public, including Claimant herein, using the roadway
17 with due care in a reasonably foreseeable manner. Given its size and depth, and its location within
18 the path of travel of vehicles and bicycles turning at the intersection, the pothole presented a
19 substantial risk of serious injury. Upon information and belief, the County of Kern did not place
20 any warning, barricade, marking, or other device to alert roadway users to the pothole.

21 Claimant further contends that the County of Kern knew, or upon reasonable inspection
22 should have known, of the dangerous condition sufficiently in advance of the incident such that
23 ample time existed within which to repair the pothole or otherwise protect against the dangerous
24 condition, and that the County of Kern failed to do so. Claimant is informed and believes that one
25 or more County employees and/or agents responsible for inspecting, maintaining, repairing, or
26 protecting against dangerous roadway conditions had authority and responsibility to take adequate
27

1 measures to protect against the pothole, and had the funds and other means immediately available
2 to do so.

3 As a direct and proximate result of the above actions and/or omissions of the County of
4 Kern, through its employees, Claimant has suffered serious personal injuries and damages. The
5 full extent of Claimant's damages is currently unknown.

6 The witnesses listed above are the witnesses known to Claimant at this time. Claimant
7 believes there may be other witnesses to the incident and attendant circumstances, including, but
8 not limited to, County of Kern employees tasked with constructing, inspecting, maintaining,
9 and/or repairing the subject roadway, and other witnesses currently unknown to Claimant.

10 **E. Contentions of Claimant:**

11 Negligence; Negligence per se; Negligent hiring, supervision, training, or retention;
12 Vicarious Liability; and Dangerous Condition of Public Property pursuant to *Government Code*
13 §§815.2, 815.4, 820, 830, 835, et seq., 840.2, and 840.4.

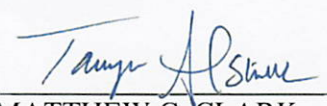
14 **F. Jurisdiction:**

15 This claim is within the jurisdiction of the Superior Court of the State of California,
16 County of Kern. The amount of this claim exceeds \$35,000.00 and therefore jurisdiction is
17 designated as unlimited.

18 I, Tanya D. Alsheikh, the undersigned, am the person presenting this Claim on behalf of
19 Claimant Daniel Ramos.

20 DATED: September 29, 2026

CHAIN | COHN | CLARK

21
22 By: 

23 MATTHEW C. CLARK
24 TANYA D. ALSHEIKH
25 Attorney for Claimant
26
27
28

FILED IN THE CLERK OF
THE COUNTY OF KERN
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Attorneys for Claimant

BY ORDER OF THE BD/SUPV
Referred To Carmy Cansel
9 pages

Copies Furnished Risk Management

Date Mailed 10-8-08
Clerk of the Board of Supervisors
By Melinda J. J. J., Deputy

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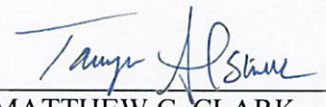
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