

VIRGINIA: IN THE CIRCUIT COURT FOR THE CITY OF VIRGINIA BEACH

**Child Doe, a minor
by and through Jane Doe,
her Mother and next friend**

Plaintiff,

Civil Action No. CL15-2215

v.

JURY TRIAL DEMANDED

**Uber Technologies, Inc., d/b/a
“Uber, UberX, Uber and/or Uber Virginia”**

**SERVE R/A: National Registered Agents, Inc. (as Registered Agent)
4701 Cox Road, Suite 285
Glen Allen, VA 23060**

and

**Rasier, LLC (an Uber subsidiary), d/b/a
“Uber, UberX, Uber and/or Uber Virginia”**

**SERVE R/A: National Registered Agents, Inc. (as Registered Agent)
4701 Cox Road, Suite 285
Glen Allen, VA 23060**

and

Isagini Alvaro Morin

**SERVE: Isagini Alvaro Morin
1325 Fallmouth Court
Virginia Beach, VA 23464**

Defendants.

COMPLAINT

COMES NOW the Plaintiff, Child Doe, a minor, by and through Jane Doe, her mother and next friend, by counsel, and moves for judgment against the Defendants, Uber Technologies, Inc. and Raiser, LLC (an Uber subsidiary doing business as Uber in Virginia) (collectively,

FILED
VA. BEACH CIRCUIT COURT
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TINA E. SIMMEN, CLERK
[Signature]
BY

“Defendant employer” or “Uber”) as well as Defendant driver Isagini Alvaro Morin (“Defendant driver” or “Morin”) for compensatory and punitive damages, on the grounds and in the amount as hereinafter set forth:

Parties, Jurisdiction and Venue

1. Jane Doe is the mother and next friend of Child Doe, a minor child. Both Jane Doe and Child Doe are natural persons, citizens of the Commonwealth of Virginia, and residents of the City of Virginia Beach, Virginia. Child Doe, age 13 at the time of the alleged incident, brings this suit anonymously in accord with the provisions of Virginia Code § 8.01-15.1.

2. Defendant Uber Technologies, Inc. is a Delaware corporation licensed in, registered in, and doing business in the Commonwealth of Virginia as “Uber,” and is presently and regularly conducting affairs and business activities in Virginia Beach, Virginia, with its principal place of business being located in San Francisco, California.

3. Defendant Raiser, LLC is a limited liability corporation licensed in, registered in, and doing business in the Commonwealth of Virginia as “Uber,” and is presently and regularly conducting affairs and business activities in Virginia Beach, Virginia, with its principal place of business being located in San Francisco, California.

4. Raiser, LLC is a subsidiary of Uber Technologies, Inc. and holds itself out as Uber. Raiser, LLC and Uber Technologies, Inc. are hereinafter collectively referred to as “Uber.”

5. The defendant driver, Morin, is a natural person, a citizen of the Commonwealth of Virginia and a resident of the City of Virginia Beach, Virginia.

6. The acts and omissions giving rise to the Plaintiff’s causes of action against the defendants all occurred in the City of Virginia Beach, Virginia.