

**THE LAW OFFICES OF JOEL J. KOFSKY
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**THIS IS AN ARBITRATION CASE
ASSESSMENT OF DAMAGES
IS REQUIRED
ATTORNEY FOR PLAINTIFF**

ASHLEY YARBROUGH
5424 Morse Street
Philadelphia, PA 19131

Plaintiff

v.

UBER TECHNOLOGIES, INC.
c/o CT Corporation System
600 North 2nd Street, #401
Harrisburg, PA 17101

and

RASIER LLC
c/o CT Corporation System
600 North 2nd Street, #401
Harrisburg, PA 17101

and

JOHN DOE UBER DRIVER

Defendants

**: COURT OF COMMON PLEAS
: DELAWARE COUNTY**

**:
: JULY TERM, 2025**

: NO.: _____

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NOTICE TO DEFEND

NOTICE	AVISO
<p>You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.</p> <p><i>You should take this paper to your lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the office set forth below to find out where you can get legal help. This office can provide you with information about hiring a lawyer. If you cannot afford to hire a lawyer, this office may be able to provide you with information about agencies that may offer legal services to eligible persons at a reduced fee or no fee.</i></p> <p style="text-align: center;">Delaware County Bar Association Lawyer Referral Service 335 West Front Street Media, Pennsylvania 19063 (610) 566-6625</p>	<p>Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademas, la corte sude decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted purde perer dinero o sus propiedades u otros derechos importantes para usted.</p> <p><i>Lleva esta demanda a un abogado inmediatamente. Si no tiene abogado o si no tiene el dinero suficiente de pagar tal servicio. Vaya en persona o llame por telefono a la oficina cuya direccion se encuentra escrita abajo para averiguar donde se sude conseguir asistencia legal.</i></p> <p style="text-align: center;">Asociación de Abogados del Condado de Delaware Servicio de referencia de abogados 335 West Front Street Media, Pennsylvania 19063 (610) 566-6625</p>

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: COURT OF COMMON PLEAS
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CIVIL ACTION COMPLAINT
MOTOR VEHICLE ACCIDENT

Plaintiff, Ashley Yarbrough, by and through her undersigned counsel, files this Civil Action Complaint against Defendants, Uber Technologies, Inc., Rasier LLC, and John Doe Uber Driver, and in support thereof, avers as follows:

1. Plaintiff, Ashley Yarbrough, is an adult individual residing at the above-captioned address.

2. Defendant Uber Technologies, Inc., is a corporation and/or other business entity that operates and does business under the laws of the Commonwealth of Pennsylvania and has designated as its registered agent for service of process the above-captioned address.
3. Defendant, Rasier LLC, is a corporation and/or other business entity that operates and does business under the laws of the Commonwealth of Pennsylvania and has designated as its registered agent for service of process the above-captioned address.
4. Defendant, John Doe Uber Driver's, actual name is unknown to Plaintiff.
5. Plaintiff avers that Defendant, John Doe Uber Driver's, designation is fictitious.
6. Upon information and belief, John Doe Uber Driver operated the motor vehicle where the Plaintiff was a passenger in whose navigation, direction and/or travel instruction was controlled, approved, and/or otherwise sanctioned by Defendants, Uber Technologies, Inc. and Raiser LLC on or about February 28, 2024.
7. On or about February 28, 2024 at or about 03:15 P.M., Plaintiff, Ashley Yarbrough, was a passenger in a motor vehicle being operated by Defendant, John Doe Uber Driver, and whose navigation, direction and/or travel instruction was controlled, approved, and/or otherwise sanctioned by Defendants, Uber Technologies, Inc. and Raiser LLC, traveling on I-76 East in Philadelphia, Pennsylvania.
8. On the aforesaid date, time and location, due to the negligence and carelessness of the Defendant, John Doe Uber Driver, the Defendants, suddenly, and without warning, caused the motor vehicle where Plaintiff was a passenger in to drive through a construction area, causing the Plaintiff to sustain severe and permanent personal injuries and other damages as more fully set forth herein.

9. The above-described collision was caused solely by the negligence and carelessness of the Defendants and was in no manner due to any act or omission on the part of the Plaintiff.

COUNT I - NEGLIGENCE
ASHLEY YARBROUGH vs. ALL DEFENDANTS

10. Plaintiff, Ashley Yarbrough, hereby incorporates all preceding paragraphs of this Complaint as though fully set forth herein.
11. The aforesaid collision was caused by the negligence and carelessness of Defendants, consisting of, but not limited to the following:
- a. violating various sections of the Pennsylvania Motor Vehicle Code by failing to operate the vehicle properly;
 - b. running the stop sign;
 - c. failing to have the vehicle within proper and adequate control;
 - d. failing to keep a reasonable lookout for vehicles lawfully upon the road;
 - e. failing to remain awake and/or attentive while operating a motor vehicle;
 - f. failing to take or employ adequate and basic maneuvers in order to avoid and/or prevent the collision in question;
 - g. failing to apply the brakes in time to avoid the collision;
 - h. failing to operate the vehicle in accordance with the existing traffic conditions;
 - i. failing to operate the vehicle in a manner consistent with the road, traffic and/or weather conditions prevailing at the time;
 - j. failing to operate the vehicle with due regard for the rights, safety, health and position of other individuals upon the roadway, including the Plaintiff;
 - k. failing to properly and adequately maintain, obey and comply with the Pennsylvania Motor Vehicle Code, or the rules of the road pertaining to the operation of motor vehicles as set forth herein; and
 - l. such other acts of negligence and carelessness as may be adduced through discovery or at trial.

12. As a result of the aforesaid accident, Plaintiff, Ashley Yarbrough, sustained serious, severe, and debilitating injuries, including, injuries to the neck, back, shoulders, chest, head, knees, body and extremities; and other injuries which may be known, other injuries which may be unknown and others which may develop, some or all of which may be permanent in nature.
13. As a further result of the said collision, Plaintiff, Ashley Yarbrough, has suffered severe pain, mental anguish, humiliation, and embarrassment, and will continue to suffer same for an indefinite period of time in the future.
14. As a further result of the said collision, Plaintiff, Ashley Yarbrough, has and will probably in the future, be obliged to receive and undergo medical attention, which was or will be reasonable and necessary arising from the aforesaid accident and will otherwise incur various expenditures for the injuries suffered.
15. As a further result of the said accident, Plaintiff, Ashley Yarbrough, has incurred medical expenses that were reasonable, necessary, and causally related to the aforesaid accident as a result of the injuries sustained in this accident.
16. As a further result of the said accident, Plaintiff, Ashley Yarbrough, has been unable to attend to daily chores, duties, and occupations, and will be unable to do so for an indefinite time in the future, all to Plaintiff, and Plaintiff's family's great financial detriment and loss.
17. As a further result of the said accident, Plaintiff, Ashley Yarbrough, has and will suffer severe loss of earnings and/or impairment of earning capacity.
18. As a further result of the said accident, Plaintiff, Ashley Yarbrough, has and will incur pecuniary damages including, but not limited to rental car costs, storage costs, alternative transportation costs and property damage to said vehicle.

19. At all times material hereto, Plaintiff, Ashley Yarbrough, is entitled to receive full tort benefits under the laws of the Commonwealth of Pennsylvania, specifically as set forth in the Pennsylvania Motor Vehicle Financial Responsibility Law, 75 Pa.C.S. §§ 1701, et seq.

WHEREFORE, Plaintiff, Ashley Yarbrough, demands judgment in her favor and against the Defendants for an amount not in excess of Fifty Thousand Dollars (\$50,000.00) in compensatory damages, together with interest and costs of suit.

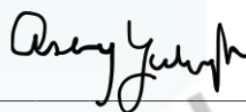
COUNT II – NEGLIGENT ENTRUSTMENT
ASHLEY YARBROUGH vs. UBER TECHNOLOGIES, INC and RASIER LLC

20. Plaintiff, Ashley Yarbrough, hereby incorporates all preceding paragraphs of this Complaint as though fully set forth herein.
21. The aforesaid accident was caused by the negligence and carelessness of Defendants, Uber Technologies Inc. and Rasier LLC, by and through Defendant John Doe Driver, which consisted of, but was not limited to:
- a. negligently and carelessly entrusting a motor vehicle to Defendant John Doe Driver, when Defendants, Uber Technologies Inc. and Rasier LLC, knew or should have known of the Defendant-Driver's inability and unfitness to drive on the date of the aforementioned incident;
 - b. negligently and carelessly failing to properly investigate the background and driving record of Defendant John Doe Driver;
 - c. placing persons, such as Plaintiff, on the highway and roads in danger;
 - d. such other acts of negligence and carelessness which may be adduced through discovery or at trial.
22. As a direct and proximate cause of the aforesaid negligence of Defendant, Plaintiff, suffered damages as more fully described herein.

VERIFICATION

I, Ashley Yarbrough, am the Plaintiff in this action and hereby verify that the statements made in the foregoing pleading are true and correct to the best of my knowledge, information, and belief.

I understand that the statements in said pleading are made subject to the penalties of 18 Pa.C.S. § 4904, relating to unsworn falsification to authorities.



Signature

DATE: 07/25/2025

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