

1 [REDACTED]  
 2 [REDACTED]  
 3 [REDACTED]  
 4 [REDACTED]  
 5 [REDACTED]  
 6 [REDACTED]  
 7 [REDACTED]  
 8 [REDACTED]  
 9 [REDACTED]

10  
 11 Attorneys for Plaintiff,  
 Oscar Willhelm Nilsson

12  
 13  
 14 UNITED STATES DISTRICT COURT  
 15 NORTHERN DISTRICT OF CALIFORNIA

16 Oscar Willhelm Nilsson,  
 17 Plaintiff,  
 18 vs.  
 19 General Motors LLC,  
 20 Defendant.  
 21

Case No.:  
**COMPLAINT FOR DAMAGES**  
**1. NEGLIGENCE**  
**JURY TRIAL DEMANDED**

22  
 23 This is a personal injury complaint by a motorcyclist injured by a self-driving  
 24 vehicle. The Plaintiff, Oscar Willhelm Nilsson, by undersigned counsel, states as  
 25 follows:  
 26  
 27  
 28

**JURISDICTION**

1  
2 1. This Court has jurisdiction over this matter under 28 U.S.C. § 1332 in  
3  
4 that there is complete diversity of citizenship between the parties and the amount in  
5 controversy exceeds \$75,000.00.

6 2. Personal jurisdiction and venue are proper in this District pursuant to 28  
7  
8 U.S.C. § 1391(b) in that Defendant transacts business here and a substantial portion of  
9 the acts giving rise to this action occurred here.

**PARTIES**

10  
11 3. The Plaintiff, Oscar Willhelm Nilsson (hereafter “Mr. Nilsson”), is an  
12  
13 adult individual residing at San Francisco, California.

14 4. Defendant, General Motors LLC (hereafter the “Manufacturer,” and/or  
15  
16 “Defendant”), is a business entity with a principal place of business at 300  
17 Renaissance Center, Detroit, Michigan 48232. The Manufacturer is in the business of  
18 marketing, supplying, and selling motor vehicles in this District.

**ALLEGATIONS OF FACT**

19  
20 5. On the morning of December 7, 2017, Mr. Nilsson was proceeding east  
21  
22 on the middle lane of Oak Street on his motorcycle in the city of San Francisco,  
23 California.

24 6. At the same time and place, Mr. Manuel DeJesus Salazar (hereinafter  
25  
26 “Mr. Salazar”) was in the driver’s seat of a 2016 Chevrolet Bolt vehicle, manufactured  
27  
28 by Defendant General Motors LLC (hereinafter “Self-Driving Vehicle”).





1 DATED: January 22, 2018

[REDACTED]

2

3

[REDACTED]

4

[REDACTED]

5

[REDACTED]

6

[REDACTED]

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28