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**THE SECOND DISTRICT COURT
IN AND FOR WEBER COUNTY, STATE OF UTAH**

LILIANA PRESSGROVE, an individual,

Plaintiff,

vs.

WEBER FIRE DISTRICT, a government
entity, WEBER COUNTY, a government
entity

Defendant.

**COMPLAINT AND REQUEST
FOR ARBITRATION**

Case No.

Judge:

TIER 2

COMES NOW plaintiff Liliana Pressgrove, in his individual capacity, now bring this action against Defendant, Weber Fire District and Weber County, by and through his undersigned counsel, and hereby complains, alleges, and asserts the following:

PARTIES

1. Plaintiff Liliana Pressgrove, hereinafter known as (“Plaintiff”) is an adult and a resident of Weber County, Utah.

2. Upon information and belief Defendant Weber Fire District, hereinafter known as (“Defendant WFD”) is a governmental entity with offices in Weber County, State of Utah.

3. Upon information and belief Defendant Weber County, hereinafter known as (:Defendant Weber County) is a governmental entity with offices in Weber County, State of Utah.

JURISDICTION AND VENUE

4. This Court has jurisdiction over the parties and the subject matter of this Complaint pursuant to Utah Code Ann. § 78A-5-102 et seq.

5. The various causes of action against Defendants arose wholly in Weber County, Utah.

6. Venue is proper in this Court pursuant to Utah Code Ann. §78B-3a-201 because this county is the location wherein the cause of action arose.

FACTS

7. On or about February 2, 2024, Plaintiff was operating a motor vehicle in West Haven, Weber County, Utah.

8. At all relevant times, Plaintiff was lawfully operating their on I-15, a public roadway.

9. At the same time and place, a Weber Fire District fire truck, was traveling on the roadway and lost several sections of fire hose, which fell and came to rest in the active travel lanes.

10. The fire hose created hazardous conditions for motorists traveling in the area.

11. Shortly thereafter, Plaintiff's vehicle struck the fire hose in the roadway, resulting in a flat tire.

12. At all relevant times, Plaintiff was exercising reasonable care and was unable to avoid the roadway debris caused by the fire hose.

13. Plaintiff's vehicle sustained damage to the rear as a result of the collision.

14. No person or entity other than Defendant was responsible for causing the collision.
15. Plaintiff sustained physical injuries as a result of the collision.
16. Plaintiff further suffered pain, emotional distress, mental anguish, and loss of enjoyment of life as a result of the collision.
17. Plaintiff required medical evaluation, care, and treatment as a result of the injuries sustained in the collision.
18. Plaintiff's injuries were serious and continuing in nature, causing her to incur medical expenses in amounts to be proven at trial.

FIRST CAUSE OF ACTION
(Negligence)

19. Plaintiff re-alleges and fully incorporates the allegations in each preceding paragraph of this Complaint as if fully set forth herein.
20. At all relevant times, Defendant owed a duty to Plaintiff and other motorists to operate and maintain its vehicle and equipment in a reasonably safe manner, and to prevent hazardous conditions from being created in the roadway.
21. Defendant breached this duty by, among other things, failing to properly secure and maintain the fire hose carried by the Weber Fire Truck, thereby allowing multiple sections of hose to fall into the active travel lanes.
22. Defendant further breached its duty by failing to timely remove the roadway debris or otherwise warn approaching motorists of the dangerous condition.
23. Defendant's negligence was a direct and proximate cause of Plaintiff's injuries and damages.

24. Plaintiff has incurred and will incur economic and non-economic damages of a nature and amount presently unknown but will be proven at trial.

25. The incident was the cause in fact of Plaintiff's damages, which include physical injuries, medical expenses, and pain and suffering.

TIER DESIGNATION AND REQUEST FOR ARBITRATION

26. Pursuant to Utah Rules of Civil Procedure 8(a) and 26(c)(3), this matter falls under Tier 1 and should be permitted discovery pursuant to Tier 2. Plaintiff hereby requests arbitration in this matter pursuant to Utah Code §31a-22-321.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment against Defendant as follows:

1. For general damages for pain and suffering in an amount to be proven at trial.
2. For special damages in an amount to be proven at trial.
3. For past and future medical expenses in an amount to be proven at trial.
4. For mileage costs for attending doctors' appointments.
5. For loss of future earning potential.
6. For attorney's fees and costs of suit herein.
7. For prejudgment and post-judgment interest.
8. For such other relief as may be deemed fair and equitable under the circumstances.

SIGNED and DATED this 26th of January 2026

JACOB JENSEN & ASSOCIATES

/s/ John A. Quinn
JOHN A. QUINN
Attorney for Plaintiff

