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David W. Slayton,
Executive Officer/Clerk of Court,
By G. Delgado, Deputy Clerk

Attorneys for Plaintiffs
NAOMI GREER-WILKINSON, an incompetent adult, by and through her Guardian Ad Litem,
JOSHUA WILKSINSON; EMMA GREER-WILKINSON, an individual; and OSCAR GREER-
WILKINSON, an individual,

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

NAOMI GREER-WILKINSON, an
incompetent adult, by and through her Guardian
Ad Litem, JOSHUA WILKSINSON; EMMA
GREER-WILKINSON, an individual; and
OSCAR GREER-WILKINSON, an individual,

Plaintiffs,

vs.

MAGIC MOUNTAIN, LLC, a California
limited liability company; SIX FLAGS
ENTERTAINMENT CORPORATION, a
Delaware corporation; SIX FLAGS THEME
PARKS, INC., a Delaware corporation; S&S
WORLDWIDE, INC., a Utah corporation; S&S
POWER, INC., a Delaware corporation; S&S
ARROW, LLC, a Utah limited liability
company; TIMOTHY BURKHART, an
individual; TIM DOFFLOW, an individual;
JEFFREY D. HUDGINS, an individual;
JUSTIN MIYAHIRA, an individual; and
DOES 1 through 100, inclusive,

Defendants.

Case No.: **26STCV29927**

COMPLAINT FOR DAMAGES

- 1. Strict Product Liability – Design Defect**
- 2. Strict Product Liability – Failure to Warn**
- 3. Negligent Product Design**
- 4. Negligent Failure to Warn**
- 5. Negligence / Common Carrier Liability**
- 6. Premises Liability**
- 7. Fraudulent Concealment**
- 8. Negligent Infliction of Emotional Distress – Emma Greer-Wilkinson**
- 9. Negligent Infliction of Emotional Distress – Oscar Greer-Wilkinson**

[DEMAND FOR JURY TRIAL]

1 Plaintiffs NAOMI GREER-WILKINSON, an incompetent adult, by and through her
2 Guardian Ad Litem, JOSHUA WILKSINSON; EMMA GREER-WILKINSON, an individual;
3 and OSCAR GREER-WILKINSON, an individual, allege against Defendants, and each of them,
4 as follows:

5 **INTRODUCTION**

6 1. This action arises from a catastrophic brain injury suffered by Plaintiff Naomi
7 Greer-Wilkinson on the 4th Dimension roller coaster known as X2 ("X2") at Six Flags Magic
8 Mountain located on 26101 Magic Mountain Pkwy in Valencia, California, six days after Six
9 Flags Magic Mountain received direct notice that another rider had suffered a nearly identical
10 catastrophic brain injury on the same ride.

11 2. On July 5, 2026, a Six Flags Magic Mountain patron, Pamela Guillen, then 39
12 years old, rode X2. She was healthy, conscious, ambulatory, and neurologically intact when she
13 boarded.

14 3. When X2 returned to the station, Ms. Guillen's daughter, who had ridden with her,
15 observed her mother sitting with a vacant stare and her mouth open. Ms. Guillen attempted to
16 leave the ride but was confused and unstable on her feet. She stumbled after exiting X2 and
17 shortly thereafter collapsed.

18 4. Ms. Guillen was transported to the hospital, where imaging revealed a massive
19 intracranial hemorrhage and life-threatening traumatic brain injury. Emergency neurosurgical
20 intervention was required, including multiple craniotomy procedures.

21 5. Six Flags knew of Ms. Guillen's catastrophic injury immediately following the
22 July 5, 2026, incident. It nevertheless continued to operate X2 without adequately investigating
23 the cause of her injury or warning subsequent riders.

24 6. Six days later, on July 11, 2026, Plaintiff NAOMI GREER-WILKINSON, then
25 25 years old, boarded X2 with her siblings, Plaintiffs EMMA GREER-WILKINSON and
26 OSCAR GREER-WILKINSON.

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1 7. At the conclusion of the ride, Emma and Oscar observed that Naomi was
2 confused and having difficulty walking. Naomi stumbled while attempting to exit X2 and
3 thereafter rapidly lost consciousness.

4 8. Naomi was transported for emergency medical treatment and was found to have
5 suffered massive intracranial hemorrhaging and catastrophic traumatic brain injury.

6 9. Naomi underwent multiple emergency craniotomy procedures and other
7 neurosurgical interventions to evacuate blood and relieve pressure on her brain.

8 10. Naomi remains bedridden, ventilator dependent, unable to speak, unable to
9 voluntarily move her extremities, and in a minimally conscious state. She has shown limited
10 neurological improvement, including some ability to open her eyes.

11 11. But to the owner, operator, manager, and/or those who control Six Flags Magic
12 Mountain as well as those who designed, manufactured, built, installed, inspected, repaired, and
13 maintained X2, Naomi's injury did not occur without warning.

14 12. For years before July 2026, Six Flags knew that passengers had suffered serious
15 head and brain injuries after riding X2.

16 13. Plaintiffs are informed and believe, and thereon allege, that Six Flags and related
17 entities have previously been sued more than a dozen times in actions arising from catastrophic
18 brain injuries allegedly suffered by passengers riding X2 and/or its predecessor configuration.

19 14. Among the prior incidents was a February 16, 2020 incident in which X2
20 passenger Sheila Katerelos alleged that she suffered a traumatic brain injury, subdural
21 hematoma, and other catastrophic injuries while riding X2.

22 15. On June 23, 2022, 22-year-old Christopher Hawley rode X2 with his brother and
23 cousin. According to allegations subsequently made against Six Flags, the ride was extremely
24 rough and subjected its riders to violent forces.

25 16. After exiting X2, Hawley walked slowly and with difficulty, used a handrail for
26 support, complained of head pain, collapsed, and lost consciousness.

27 17. Hospital imaging revealed extensive intracranial hemorrhage, including a massive
28 subdural hematoma and significant brain shift.

1 18. Hawley underwent an emergency right frontotemporoparietal craniotomy but died
2 the following day.

3 19. His death was attributed to head trauma sustained in a park ride accident.

4 20. Six Flags was thereafter sued in an action specifically alleging that the forces
5 generated by X2 caused Hawley's catastrophic brain injury and death.

6 21. Thus, long before Naomi Greer-Wilkinson rode X2, Six Flags had actual
7 knowledge that passengers had alleged serious and catastrophic brain injuries arising from the
8 ride, including subdural hemorrhage, traumatic brain injury, and death and, as of six days before
9 Naomi's ride, actual knowledge that Pamela Guillen had suffered the same catastrophic injury on
10 the very same ride.

11 22. Despite that history, Six Flags did not warn Naomi that riders had previously
12 suffered catastrophic intracranial bleeding, permanent brain damage, coma, or death after riding
13 X2.

14 23. Six Flags did not warn Naomi of the Hawley death.

15 24. Six Flags did not warn Naomi of the Katerelos brain injury and subdural
16 hematoma.

17 25. Six Flags did not warn Naomi that, only six days earlier, Pamela Guillen had
18 exited X2 profoundly neurologically impaired and was thereafter diagnosed with a massive
19 intracranial hemorrhage requiring emergency neurosurgery.

20 26. Six Flags did not disclose the other prior catastrophic brain injury claims and
21 lawsuits known to it.

22 27. Plaintiffs are further informed and believe that Six Flags has engaged in a pattern
23 and practice of attempting to keep evidence concerning X2 injuries and safety issues from
24 becoming publicly available.

25 28. Plaintiffs are informed and believe that this practice has prevented prospective
26 customers from learning material information concerning prior incidents, injury claims,
27 engineering evidence, ride-safety information, and Six Flags' knowledge concerning the risk of
28 serious injury associated with X2.

1 29. Plaintiffs are informed and believe that Six Flags understood that disclosure of
2 prior catastrophic brain injuries associated with X2 would affect whether members of the public
3 chose to ride it and, consequently, the revenues generated by the attraction and the park.

4 30. A reasonable customer deciding whether to board a recreational roller coaster
5 would consider it material that other passengers had allegedly suffered intracranial hemorrhage,
6 permanent traumatic brain injury, coma, or death while riding the same attraction — and would
7 consider it especially material that another rider had suffered that exact injury on that exact ride
8 only days earlier.

9 31. Naomi was not given that information.

10 32. Had she been adequately warned of the risk of catastrophic brain injury, the
11 history of prior catastrophic brain injuries associated with X2, and Pamela Guillen's injury six
12 days earlier, she would not have ridden it.

13 33. The July 11, 2026 injury to Naomi is particularly significant because Six Flags
14 had received yet another direct warning only six days earlier when Pamela Guillen exited X2
15 profoundly neurologically impaired and was thereafter diagnosed with a massive intracranial
16 hemorrhage requiring emergency neurosurgery.

17 34. Six Flags nevertheless continued operating X2 without adequately warning
18 subsequent riders of Ms. Guillen's injury or suspending operation of the ride until the cause of
19 her catastrophic brain injury could be adequately investigated.

20 **JURISDICTION AND VENUE**

21 35. This Court has jurisdiction over this action because the amount in controversy
22 exceeds the minimum jurisdictional limit of this Court.

23 36. Venue is proper in the County of Los Angeles pursuant to Code of Civil
24 Procedure section 395 because the incident giving rise to this action occurred at Six Flags Magic
25 Mountain, located at 26101 Magic Mountain Parkway, Valencia, California, in Los Angeles
26 County.

27 37. This Court has personal jurisdiction over Defendants because each Defendant is
28 authorized to conduct business in California, regularly conducts business in California, has

substantial and continuous contacts with California, and/or purposefully avails itself of the benefits of conducting business in California.

THE PARTIES

38. Plaintiff NAOMI GREER-WILKINSON was 25 years old on July 11, 2026. She is now and at all relevant times was a resident of the state of California, domiciled in Los Angeles, California.

39. Plaintiff EMMA GREER-WILKINSON is Naomi Greer-Wilkinson's sibling and was present with Naomi during the July 11, 2026 incident. She is now and at all relevant times was a resident of the State of California, domiciled in Los Angeles, California.

40. Plaintiff OSCAR GREER-WILKINSON is Naomi Greer-Wilkinson's sibling and was present with Naomi during the July 11, 2026 incident. He is now and at all relevant times was a resident of the State of California, domiciled in Los Angeles, California.

41. Plaintiffs are informed and believe, and thereon allege, that Defendant MAGIC MOUNTAIN, LLC ("Magic Mountain") was and is a California limited liability company and at all relevant times owned, operated, managed, maintained, and/or controlled Six Flags Magic Mountain.

42. Plaintiffs are informed and believe, and thereon allege, that Defendant SIX FLAGS ENTERTAINMENT CORPORATION ("Six Flags Entertainment") was and is a Delaware corporation authorized to conduct business in California and at all relevant times owned, operated, managed, and/or controlled Six Flags Magic Mountain.

43. Plaintiffs are informed and believe, and thereon allege, that Defendant SIX FLAGS THEME PARKS, INC. ("Six Flags Theme Parks") was and is a Delaware corporation authorized to conduct business in California and participated in the ownership, operation, management, maintenance, safety oversight, and/or control of Six Flags Magic Mountain and X2.

44. Plaintiffs are informed and believe, and thereon allege, that Defendant S&S WORLDWIDE, INC. ("S&S Worldwide") was and is a Utah corporation authorized to conduct business in California and designed, redesigned, manufactured, supplied, sold, serviced,

1 inspected, evaluated, and/or possessed specialized engineering knowledge concerning X2 and its
2 trains.

3 45. Plaintiffs are informed and believe, and thereon allege, that S&S WORLDWIDE,
4 INC. is or was formerly known as and/or did business as S&S Sports Power, Inc., S&S Power,
5 Inc. (S&S Power”), S&S Sports, Inc., and/or S&S Power, Inc., a Delaware corporation, and is a
6 successor in interest to S&S Arrow, LLC, a Utah limited liability company, (S&S Arrow”) in
7 connection with the design of the X2 trains and to Arrow Dynamics, Inc.

8 46. Plaintiffs are informed and believe, and thereon allege, that Defendants S&S
9 POWER, INC. and S&S ARROW, LLC participated in the design, manufacture, redesign,
10 engineering, production, supply, testing, inspection, certification, modification, and/or servicing
11 of X2, its trains, and its component systems.

12 47. Plaintiffs are informed and believe, and thereon allege, that Defendant TIMOTHY
13 BURKHART served as Vice President of Maintenance and Construction for Six Flags Magic
14 Mountain and was responsible for matters concerning ride maintenance and safety, including X2,
15 during periods relevant to the allegations herein and is now and that during all relevant times was
16 a California resident domiciled in California.

17 48. Plaintiffs are informed and believe, and thereon allege, that Defendant TIM
18 DOFFLOW served as Director of Maintenance for Six Flags Magic Mountain and had
19 responsibility for maintenance of X2 during periods relevant to the allegations herein and is now
20 and that during all relevant times was a California resident domiciled in California.

21 49. Plaintiffs are informed and believe, and thereon allege, that Defendant JEFFREY
22 D. HUDGINS served as a Corporate Engineer for Six Flags Magic Mountain and had
23 responsibility relating to certification and safety of rides at the park, including X2 and is now and
24 that during all relevant times was a California resident domiciled in California.

25 50. Plaintiffs are informed and believe, and thereon allege, that Defendant JUSTIN
26 MIYAHIRA served as Manager of Public Safety for Six Flags Magic Mountain and had
27 responsibility relating to patron safety and is now and that during all relevant times was a
28 California resident domiciled in California.

51. Defendants BURKHART, DOFFLOW, HUDGINS, and MIYAHIRA are referred to collectively as the Individual Defendants. Each Individual Defendant is sued for his own alleged acts and omissions within the scope of his respective maintenance, engineering, certification, ride-safety, and/or patron-safety responsibilities.

52. The true names and capacities of Defendants sued herein as DOES 1 through 100, inclusive, are presently unknown to Plaintiffs, who therefore sue said Defendants by such fictitious names. Plaintiffs will amend this Complaint to allege their true names and capacities when ascertained.

53. Plaintiffs are informed and believe, and thereon allege, that each Defendant was at all relevant times the agent, employee, servant, partner, joint venturer, representative, managing agent, and/or participant of one or more of the remaining Defendants and was acting within the course and scope of that relationship.

X2 AND ITS HISTORY

54. Six Flags Magic Mountain is a large amusement park located in Valencia, California.

55. Six Flags has marketed Magic Mountain as the "Thrill Capital of the World."

56. X2, originally known as X, is a fourth-dimension roller coaster in which passenger seats rotate independently of the orientation and movement of the train and track.

57. X was originally scheduled to open in 2001 but did not open to the public until 2002.

58. Plaintiffs are informed and believe that X experienced design and operational problems from its inception.

59. In 2002, X was shut down because of problems involving its trains and thereafter reopened following design changes.

60. In late 2007, the ride was again closed for redesign, including replacement of its trains.

61. Plaintiffs are informed and believe that new trains were designed by or through S&S entities, and the ride reopened as X2 in or about May 2008.

62. Plaintiffs are informed and believe that X2 thereafter experienced additional mechanical, maintenance, and operational issues.

63. X2 subjects riders to high speeds, rapid changes in direction, inversions, independent seat rotation, and significant forces acting upon the body and head.

64. A patron can reasonably expect X2 to be fast, frightening, disorienting, and physically intense.

65. A patron does not reasonably expect that riding X2 in the ordinary and intended manner may cause intracranial blood vessels to rupture, producing massive intracranial hemorrhage, permanent brain damage, coma, or death.

PRIOR INCIDENTS AND NOTICE

66. Before July 11, 2026, Defendants had received reports of serious injuries to X2 passengers, including injuries to the head, neck, spine, and brain.

67. Plaintiffs are informed and believe that Defendants had reported certain X2 injuries to state safety authorities.

68. Plaintiffs are informed and believe that Defendants had also been involved in repeated litigation concerning serious injuries alleged to have resulted from riding X2.

69. Plaintiffs are informed and believe that Six Flags and related entities had been sued more than a dozen times before July 2026 in cases arising from catastrophic brain injuries allegedly suffered by X2 passengers.

70. These prior claims and lawsuits provided Six Flags with information concerning the circumstances of the incidents, the injuries claimed, medical diagnoses, alleged mechanisms of injury, expert opinions, ride forces, design issues, maintenance issues, operational practices, and warnings.

71. On February 16, 2020, Sheila Katerelos was allegedly severely injured while riding X2 and sustained, among other injuries, a traumatic brain injury and subdural hematoma.

72. That action alleged that Six Flags personnel responsible for maintenance and safety knew that park patrons had previously sustained head injuries on X2.

73. On June 23, 2022, Christopher Hawley, then 22 years old, rode X2 with his

1 younger brother and cousin.

2 74. The subsequent lawsuit arising from Hawley's death alleged that the ride was
3 extremely rough and violently jerked its riders.

4 75. After exiting X2, Hawley walked slowly and haltingly, held onto a handrail for
5 support, complained that his head hurt, collapsed, and lost consciousness.

6 76. A CT scan revealed extensive intracranial hemorrhage, including a 1.5-centimeter
7 right subdural hematoma and significant shift.

8 77. Hawley underwent an emergency right frontotemporoparietal craniotomy.

9 78. He died the following day.

10 79. The coroner attributed his death to head trauma from a park ride accident.

11 80. Six Flags and other Defendants thereafter defended litigation expressly alleging
12 that X2 caused Hawley's catastrophic brain injury and death.

13 81. On July 5, 2026, six days before Naomi's ride, Pamela Guillen suffered a massive
14 intracranial hemorrhage and catastrophic traumatic brain injury immediately after riding X2,
15 requiring emergency neurosurgery, as alleged above.

16 82. Accordingly, by July 11, 2026 Six Flags was aware not merely of a theoretical
17 possibility of brain injury, but of actual, repeated claims, including one from six days earlier on
18 the very same ride, that X2 had caused traumatic brain injury, subdural hematoma, massive
19 intracranial hemorrhage, and death.

20 83. Plaintiffs are informed and believe that additional prior X2 riders had suffered
21 serious head and brain injuries known to Defendants before the incident giving rise to this action.

22 84. Despite this history, the warnings provided to X2 passengers did not adequately
23 disclose that ordinary operation of the ride could expose passengers to the risk of catastrophic
24 intracranial hemorrhage, permanent brain damage, coma, or death.

25 **CONCEALMENT OF X2'S INJURY HISTORY**

26 85. Plaintiffs are informed and believe that Six Flags has repeatedly sought to restrict
27 public disclosure of evidence concerning X2 injuries and safety issues.

28 86. Plaintiffs are informed and believe that information subject to such suppression

1 efforts has included evidence concerning prior incidents, injury claims, investigations,
2 engineering and operational matters, maintenance, testing, and Six Flags' knowledge concerning
3 X2.

4 87. Six Flags possessed substantially greater information concerning the history and
5 risks of X2 than did ordinary members of the public.

6 88. Whether healthy passengers had previously suffered catastrophic brain injuries on
7 X2, including six days earlier on that same ride, was material to the decision of a reasonable
8 patron deciding whether to ride.

9 89. Plaintiffs are informed and believe that Six Flags understood that widespread
10 public knowledge of catastrophic brain injuries associated with X2 could deter members of the
11 public from riding the attraction and thereby adversely affect revenue.

12 90. Six Flags nevertheless did not disclose the relevant history to Naomi Greer-
13 Wilkinson.

14 91. Naomi was not advised that a previous X2 rider had suffered a subdural
15 hematoma and traumatic brain injury.

16 92. She was not advised that Christopher Hawley suffered massive intracranial
17 hemorrhage after riding X2 and died the following day.

18 93. She was not advised that, six days earlier, Pamela Guillen had suffered massive
19 intracranial hemorrhage requiring emergency neurosurgery after riding X2.

20 94. She was not advised of the numerous other catastrophic brain injury claims and
21 lawsuits known to Six Flags.

22 95. Had Naomi been advised that riders had previously suffered catastrophic
23 intracranial hemorrhage, permanent brain damage, coma, or death in connection with X2 —
24 including six days earlier — she would not have ridden it.

25 **NAOMI GREER-WILKINSON – JULY 11, 2026**

26 96. On July 11, 2026, Naomi Greer-Wilkinson visited Six Flags Magic Mountain
27 with her siblings, Emma Greer-Wilkinson and Oscar Greer-Wilkinson.

28 97. Naomi boarded X2 with Emma and Oscar.

1 98. Naomi was properly secured, complied with the instructions provided to her, and
2 rode X2 in an intended and reasonably foreseeable manner.

3 99. During the ride, Naomi was subjected to sudden, violent, erratic, and excessive
4 forces.

5 100. At the conclusion of the ride, Emma and Oscar immediately observed that Naomi
6 was confused and having difficulty walking.

7 101. Naomi stumbled while attempting to exit X2.

8 102. Emma and Oscar personally witnessed Naomi's neurological condition
9 deteriorate.

10 103. Naomi thereafter lost consciousness.

11 104. She was transported for emergency medical treatment.

12 105. Imaging revealed massive intracranial hemorrhaging and catastrophic traumatic
13 brain injury.

14 106. Naomi underwent multiple emergency craniotomy procedures and other
15 neurosurgical interventions intended to evacuate blood, relieve pressure upon her brain, and
16 prevent further neurological injury.

17 107. Naomi remains profoundly disabled.

18 108. She is bedridden.

19 109. She remains ventilator dependent.

20 110. She is unable to speak.

21 111. She is unable voluntarily to move her extremities.

22 112. Naomi remains in a minimally conscious state and has demonstrated limited signs
23 of neurological improvement, including opening her eyes.

24 113. She faces extensive future medical treatment, rehabilitation, attendant care,
25 custodial care, therapy, equipment needs, and related expenses.

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1 **FIRST CAUSE OF ACTION**

2 **Strict Product Liability – Design Defect**

3 **Against Defendants Magic Mountain, Six Flags Entertainment, Six Flags Theme Parks,**
4 **S&S Worldwide, S&S Power, S&S Arrow, and Does 1–100**

5 114. Plaintiffs incorporate by reference the foregoing paragraphs as though fully set
6 forth herein.

7 115. Defendants designed, manufactured, produced, built, distributed, sold, supplied,
8 installed, modified, inspected, repaired, maintained, operated, certified, and/or were otherwise
9 responsible for X2 and its component parts.

10 116. X2 was defectively designed because it failed to perform as safely as an ordinary
11 consumer would expect when used in an intended or reasonably foreseeable manner.

12 117. An ordinary consumer would not expect that riding X2 in the manner intended
13 could cause massive intracranial hemorrhage, traumatic brain injury, permanent neurological
14 impairment, coma, or death.

15 118. X2 was further defectively designed because the risks inherent in its design
16 outweighed the benefits of that design.

17 119. Reasonably feasible safer alternative designs existed that could have reduced or
18 eliminated the risk of catastrophic head and brain injury.

19 120. The defective condition of X2 was a substantial factor in causing the injuries
20 sustained by Naomi Greer-Wilkinson.

21 121. Plaintiffs seek all resulting damages according to proof.

22 **SECOND CAUSE OF ACTION**

23 **Strict Product Liability – Failure to Warn**

24 **Against Defendants Magic Mountain, Six Flags Entertainment, Six Flags Theme Parks,**
25 **S&S Worldwide, S&S Power, S&S Arrow, and Does 1–100**

26 122. Plaintiffs incorporate by reference the foregoing paragraphs as though fully set
27 forth herein.

28 123. At the time Naomi rode X2, the risk that X2 could cause serious or catastrophic

1 head and brain injury was known or knowable in light of the generally recognized and prevailing
2 scientific and technical knowledge available to Defendants.

3 124. Defendants possessed actual knowledge of prior serious head and brain injuries
4 allegedly caused by X2, including the injury suffered by Pamela Guillen only six days earlier.

5 125. The risk of intracranial hemorrhage, catastrophic traumatic brain injury, coma,
6 permanent neurological impairment, and death was not obvious to an ordinary rider.

7 126. Defendants failed to provide adequate warnings concerning these risks.

8 127. Such warnings were feasible and could have been provided without impairing the
9 function of the ride.

10 128. Naomi would not have ridden X2 had she been adequately warned of the risk and
11 prior history of catastrophic brain injury associated with the ride, including Pamela Guillen's
12 injury six days earlier.

13 129. Defendants' failure to provide adequate warnings was a substantial factor in
14 causing Naomi's injuries.

15 **THIRD CAUSE OF ACTION**

16 **Negligent Product Design**

17 **Against Defendants Magic Mountain, Six Flags Entertainment, Six Flags Theme Parks,**
18 **S&S Worldwide, S&S Power, S&S Arrow, Timothy Burkhardt, Tim Dofflow, Jeffrey D.**
19 **Hudgins, Justin Miyahira, and Does 1–100**

20 130. Plaintiffs incorporate by reference the foregoing paragraphs as though fully set
21 forth herein.

22 131. The Individual Defendants each owed an independent duty to exercise reasonable
23 care within the scope of their respective responsibilities for X2 maintenance, inspection,
24 engineering, certification, ride safety, and/or patron safety.

25 132. The Individual Defendants are sued for their own alleged acts and omissions,
26 including their personal participation in, direction of, approval of, and/or responsibility for the
27 maintenance, inspection, certification, safety evaluation, investigation, warnings, and continued
28 operation of X2.

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**Against Defendants Magic Mountain, Six Flags Entertainment, Six Flags Theme Parks,
and Does 1–100**

152. Plaintiffs incorporate by reference the foregoing paragraphs as though fully set forth herein.

153. Defendants Magic Mountain, Six Flags Entertainment, Six Flags Theme Parks, and Does 1 through 100 owned, leased, occupied, managed, maintained, and/or controlled the premises upon which Six Flags Magic Mountain and X2 were located.

154. X2 presented a dangerous condition because it exposed patrons to an unreasonable risk of catastrophic head and brain injury that was not apparent to ordinary patrons.

155. Defendants knew or should have known of that condition because of the prior injuries, claims, complaints, investigations, and lawsuits involving X2, including Pamela Guillen's injury six days before Naomi's ride.

156. Defendants failed to correct the dangerous condition and failed to adequately warn Plaintiffs of it.

157. Defendants' negligence was a substantial factor in causing the injuries sustained by Naomi Greer-Wilkinson.

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**Against Defendants Magic Mountain, Six Flags Entertainment, Six Flags Theme Parks,
and Does 1–100**

158. Plaintiffs incorporate by reference the foregoing paragraphs as though fully set forth herein.

159. Before Naomi rode X2, Six Flags possessed material information concerning the history and risks associated with the ride that was not known or reasonably available to prospective riders.

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1 160. Six Flags knew of prior allegations that passengers had suffered serious and
2 catastrophic head and brain injuries after riding X2.

3 161. Plaintiffs are informed and believe that Six Flags had been sued more than a
4 dozen times as a result of catastrophic brain injuries allegedly suffered on X2.

5 162. Six Flags knew that Sheila Katerelos alleged that she suffered traumatic brain
6 injury and a subdural hematoma while riding X2 in 2020.

7 163. Six Flags knew that Christopher Hawley suffered massive intracranial
8 hemorrhage after riding X2 in 2022 and died the following day.

9 164. By July 11, 2026, Six Flags additionally knew that Pamela Guillen had suffered
10 massive intracranial hemorrhage requiring emergency neurosurgery following her July 5, 2026
11 ride on X2.

12 165. These facts were material to a reasonable patron deciding whether to ride X2.

13 166. Six Flags had a duty to disclose these facts because it possessed exclusive or
14 superior knowledge of material risks not reasonably known to patrons, because it made
15 representations and provided warnings concerning X2 that were misleading without disclosure of
16 the omitted information, and because patrons necessarily entrusted their physical safety to Six
17 Flags when boarding the ride.

18 167. Six Flags intentionally failed to disclose these material facts.

19 168. Plaintiffs are informed and believe that Six Flags has also sought to prevent
20 information concerning X2 injuries from becoming publicly available.

21 169. Plaintiffs are informed and believe that Six Flags knew public disclosure of
22 catastrophic brain injuries associated with X2 would affect the willingness of customers to ride
23 the attraction and thereby affect revenue.

24 170. Six Flags intended that customers, including Naomi, continue to ride X2 without
25 knowledge of the concealed facts.

26 171. Naomi was unaware of these facts.

27 172. She reasonably relied upon Six Flags' representations and nondisclosures
28 concerning the ride and its risks.

1 173. Had the concealed information been disclosed, Naomi would not have ridden X2.

2 174. Six Flags' concealment was a substantial factor in causing her injuries.

3 175. The conduct alleged herein was intentional, fraudulent, and undertaken in
4 conscious disregard of the rights and safety of X2 passengers.

5 176. Plaintiffs are informed and believe that the acts and omissions alleged herein were
6 committed, authorized, directed, adopted, and/or ratified by officers, directors, and managing
7 agents of the corporate Defendants with authority over ride safety, operation, warnings, claims,
8 litigation, and continued operation of X2.

9 177. Plaintiffs seek punitive and exemplary damages pursuant to Civil Code section
10 3294.

11 **EIGHTH CAUSE OF ACTION**

12 **Negligent Infliction of Emotional Distress – Bystander**

13 **Plaintiff Emma Greer-Wilkinson Against All Defendants**

14 178. Plaintiffs incorporate by reference the foregoing paragraphs as though fully set
15 forth herein.

16 179. Emma Greer-Wilkinson is Naomi Greer-Wilkinson's sibling.

17 180. Emma was physically present during the July 11, 2026 X2 ride and its immediate
18 aftermath.

19 181. Emma contemporaneously perceived Naomi become confused, unstable, and
20 neurologically impaired immediately after riding X2.

21 182. Emma observed Naomi stumble while attempting to exit the ride.

22 183. Emma witnessed Naomi's condition rapidly deteriorate and witnessed her lose
23 consciousness.

24 184. Emma understood at the time that Naomi had suffered a serious physical injury
25 associated with the ride they had just taken together.

26 185. As a result of witnessing the injury to her sister, Emma suffered serious emotional
27 distress beyond that which would be anticipated in a disinterested witness.

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186. Defendants' negligence was a substantial factor in causing Emma's emotional distress.

NINTH CAUSE OF ACTION

Negligent Infliction of Emotional Distress – Bystander

Plaintiff Oscar Greer-Wilkinson Against All Defendants

187. Plaintiffs incorporate by reference the foregoing paragraphs as though fully set forth herein.

188. Oscar Greer-Wilkinson is Naomi Greer-Wilkinson's sibling.

189. Oscar was physically present during the July 11, 2026 X2 ride and its immediate aftermath.

190. Oscar contemporaneously perceived Naomi become confused, unstable, and neurologically impaired immediately after riding X2.

191. Oscar observed Naomi stumble while attempting to exit the ride.

192. Oscar witnessed Naomi's condition rapidly deteriorate and witnessed her lose consciousness.

193. Oscar understood at the time that Naomi had suffered a serious physical injury associated with the ride they had just taken together.

194. As a result of witnessing the injury to his sister, Oscar suffered serious emotional distress beyond that which would be anticipated in a disinterested witness.

195. Defendants' negligence was a substantial factor in causing Oscar's emotional distress.

PUNITIVE DAMAGES

196. Plaintiffs incorporate by reference the foregoing paragraphs as though fully set forth herein.

197. Before July 2026, Defendants knew of repeated allegations that X2 passengers had sustained serious head and brain injuries.

198. Defendants knew of the 2020 Katerelos traumatic brain injury and subdural hematoma claim.

1 199. Defendants knew that Christopher Hawley suffered massive intracranial
2 hemorrhage after riding X2 and died the following day.

3 200. Defendants knew that Hawley's family had commenced litigation specifically
4 alleging that X2 caused his fatal brain injury.

5 201. Despite this knowledge, Defendants continued to operate X2 without adequately
6 warning passengers that riding the attraction could result in catastrophic intracranial hemorrhage,
7 permanent brain damage, coma, or death.

8 202. On July 5, 2026, Pamela Guillen suffered a catastrophic intracranial hemorrhage
9 immediately after riding X2.

10 203. Six Flags knew that Ms. Guillen became neurologically impaired immediately
11 following the ride, stumbled, collapsed, and required emergency medical treatment, and knew or
12 thereafter learned that she required emergency brain surgery.

13 204. Nevertheless, Six Flags continued operating X2.

14 205. Six days later, Naomi Greer-Wilkinson suffered massive intracranial
15 hemorrhaging after riding the same ride.

16 206. Plaintiffs are informed and believe that officers, directors, and/or managing agents
17 of the corporate Defendants knew of the foregoing risks and incidents, possessed authority
18 concerning the continued operation of X2 and warnings provided to riders, and authorized,
19 ratified, or consciously permitted the conduct alleged herein.

20 207. Plaintiffs are further informed and believe that Six Flags deliberately withheld
21 material safety information concerning X2 because disclosure of catastrophic brain injuries
22 associated with the ride would deter prospective riders and adversely affect revenue.

23 208. The foregoing conduct constituted fraud, malice, oppression, and conscious
24 disregard for the rights and safety of X2 passengers within the meaning of Civil Code section
25 3294.

26 209. Plaintiffs therefore seek punitive and exemplary damages in an amount sufficient
27 to punish the responsible Defendants and deter similar conduct.

28 ///

1 **DAMAGES**

2 210. As a direct and proximate result of Defendants' conduct, Naomi Greer-Wilkinson
3 suffered catastrophic traumatic brain injury and intracranial hemorrhaging requiring multiple
4 craniotomies and extensive medical care.

5 211. Naomi remains bedridden, ventilator dependent, unable to speak, unable
6 voluntarily to move her extremities, and minimally conscious.

7 212. Naomi has sustained profound neurological impairment and will require extensive
8 future medical care, rehabilitation, custodial care, attendant care, therapy, equipment, and related
9 services.

10 213. Naomi has suffered and will continue to suffer compensable physical and
11 noneconomic damages according to proof.

12 214. Naomi has incurred and will incur substantial medical and life-care expenses.

13 215. Naomi has sustained and will sustain loss of earnings and earning capacity
14 according to proof.

15 216. Emma Greer-Wilkinson and Oscar Greer-Wilkinson have suffered serious
16 emotional distress as alleged herein.

17 **PRAYER FOR RELIEF**

18 WHEREFORE, Plaintiffs pray for judgment against Defendants, and each of them, as
19 follows:

- 20 1. For general and noneconomic damages according to proof;
- 21 2. For past and future medical, hospital, surgical, rehabilitative, therapeutic,
22 pharmaceutical, attendant-care, custodial-care, life-care, equipment, and related
23 expenses according to proof;
- 24 3. For past and future loss of earnings and earning capacity according to proof;
- 25 4. For damages for physical pain, mental suffering, emotional distress, disability,
26 impairment, disfigurement, inconvenience, and loss of enjoyment of life
27 according to proof;

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- 1 5. For bystander emotional-distress damages suffered by Emma Greer-Wilkinson
2 and Oscar Greer-Wilkinson according to proof;
3 6. For punitive and exemplary damages pursuant to Civil Code section 3294 against
4 those Defendants for whom such damages are recoverable;
5 7. For prejudgment and postjudgment interest as permitted by law;
6 8. For costs of suit incurred herein; and
7 9. For such other and further relief as the Court deems just and proper.

8
9 DATED: September 21, 2026

DORDICK LAW CORPORATION

10
11 By:



Christopher V. Bulone, Esq.
Gary A. Dordick, Esq.
Anastasia K. Olano, Esq.
Attorneys for Plaintiffs

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15 **DEMAND FOR A JURY TRIAL**

16 Plaintiffs demand trial by jury on all issues so triable.

17
18 DATED: September 21, 2026

DORDICK LAW CORPORATION

19
20 By:



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