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Attorneys for Plaintiffs
PAMELA GUILLEN, an individual; and CAMILLE MARQUEZ, a minor, by and through her
Guardian ad Litem, SEAN ANDERSON,

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

PAMELA GUILLEN, an individual; and
CAMILLE MARQUEZ, a minor, by and
through her Guardian ad Litem, SEAN
ANDERSON,

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.: **26STCV29908**

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 – Camille Marquez**

[DEMAND FOR JURY TRIAL]

1 Plaintiffs PAMELA GUILLEN and CAMILLE MARQUEZ, a minor, by and through her
2 Guardian ad Litem, SEAN ANDERSON, allege against Defendants, and each of them, as
3 follows:

4 **INTRODUCTION**

5 1. This action arises from a catastrophic brain injury suffered by Plaintiff Pamela
6 Guillen while riding the 4th Dimension roller coaster known as X2 ("X2") at Six Flags Magic
7 Mountain located on 26101 Magic Mountain Pkwy in Valencia, California.

8 2. On July 5, 2026, Plaintiff PAMELA GUILLEN, then 39 years old, visited Six
9 Flags Magic Mountain with her 16-year-old daughter, Plaintiff CAMILLE MARQUEZ, to
10 celebrate Camille's birthday.

11 3. Pamela boarded X2 at her daughter's urging. She was healthy, conscious,
12 ambulatory, and neurologically intact when she entered the ride.

13 4. When X2 returned to the station, Camille looked at her mother and saw her sitting
14 with a vacant stare and her mouth open. Camille initially thought Pamela was joking. She
15 quickly realized that something was seriously wrong.

16 5. Pamela attempted to leave the ride but was confused and unstable on her feet. She
17 stumbled after exiting X2 and shortly thereafter collapsed.

18 6. Pamela was transported to the hospital, where imaging revealed a massive
19 intracranial hemorrhage and life-threatening traumatic brain injury.

20 7. Emergency neurosurgical intervention was required. Pamela has undergone
21 multiple brain surgeries, including craniotomy procedures, as a result of the injuries she
22 sustained after riding X2.

23 8. Pamela's treating physicians and surgeons have concluded that her brain trauma
24 was caused by the forces imposed upon her while riding X2.

25 9. Six Flags knew of Pamela's catastrophic injury immediately following the July 5,
26 2026 incident. It nevertheless continued to operate X2 without adequately investigating the cause
27 of her injury or warning subsequent riders.

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1 10. But to the owner, operator, manager, and/or those who control Six Flags Magic
2 Mountain as well as those who designed, manufactured, built, installed, inspected, repaired, and
3 maintained X2, this incident did not occur without warning.

4 11. For years before July 2026, Six Flags knew that passengers had suffered serious
5 head and brain injuries after riding X2.

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

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

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

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

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

19 17. Hawley underwent an emergency right frontotemporoparietal craniotomy but died
20 the following day.

21 18. His death was attributed to head trauma sustained in a park ride accident.

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

24 20. Thus, long before Pamela Guillen rode X2, Six Flags had actual knowledge that
25 passengers had alleged serious and catastrophic brain injuries arising from the ride, including
26 subdural hemorrhage, traumatic brain injury, and death.

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1 21. Despite that history, Six Flags did not warn Pamela that riders had previously
2 suffered catastrophic intracranial bleeding, permanent brain damage, coma, or death after riding
3 X2.

4 22. Six Flags did not warn Pamela of the Hawley death.

5 23. Six Flags did not warn Pamela of the Katerelos brain injury and subdural
6 hematoma.

7 24. Six Flags did not disclose the other prior catastrophic brain injury claims and
8 lawsuits known to it.

9 25. Plaintiffs are further informed and believe that Six Flags has engaged in a pattern
10 and practice of attempting to keep evidence concerning X2 injuries and safety issues from
11 becoming publicly available.

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

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

19 28. A reasonable customer deciding whether to board a recreational roller coaster
20 would consider it material that other passengers had allegedly suffered intracranial hemorrhage,
21 permanent traumatic brain injury, coma, or death while riding the same attraction.

22 29. Pamela was not given that information.

23 30. Had she been adequately warned of the risk of catastrophic brain injury and the
24 history of prior catastrophic brain injuries associated with X2, she would not have ridden it.

25 31. Following Pamela's injury, Six Flags knew or should have known that continued
26 operation of X2 presented a risk of additional catastrophic brain injuries to members of the
27 public, yet it did not suspend operation of the ride to conduct an adequate investigation before
28 continuing to expose the public to it.

1 **JURISDICTION AND VENUE**

2 32. This Court has jurisdiction over this action because the amount in controversy
3 exceeds the minimum jurisdictional limit of this Court.

4 33. Venue is proper in the County of Los Angeles pursuant to Code of Civil
5 Procedure section 395 because the incident giving rise to this action occurred at Six Flags Magic
6 Mountain, located at 26101 Magic Mountain Parkway, Valencia, California, in Los Angeles
7 County.

8 34. This Court has personal jurisdiction over Defendants because each Defendant is
9 authorized to conduct business in California, regularly conducts business in California, has
10 substantial and continuous contacts with California, and/or purposefully avails itself of the
11 benefits of conducting business in California.

12 **THE PARTIES**

13 35. Plaintiff PAMELA GUILLEN was 39 years old on July 5, 2026.

14 36. Plaintiff CAMILLE MARQUEZ was 16 years old on July 5, 2026 and is Pamela
15 Guillen's daughter. Camille brings this action by and through her Guardian ad Litem, SEAN
16 ANDERSON.

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

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

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

1 X2.

2 40. Plaintiffs are informed and believe, and thereon allege, that Defendant S&S
3 WORLDWIDE, INC. ("S&S Worldwide") was and is a Utah corporation authorized to conduct
4 business in California and designed, redesigned, manufactured, supplied, sold, serviced,
5 inspected, evaluated, and/or possessed specialized engineering knowledge concerning X2 and its
6 trains.

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

12 42. Plaintiffs are informed and believe, and thereon allege, that Defendants S&S
13 POWER, INC. and S&S ARROW, LLC participated in the design, manufacture, redesign,
14 engineering, production, supply, testing, inspection, certification, modification, and/or servicing
15 of X2, its trains, and its component systems.

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

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

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

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

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

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

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

17 **X2 AND ITS HISTORY**

18 50. Six Flags Magic Mountain is a large amusement park located in Valencia,
19 California.

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

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

23 53. X was originally scheduled to open in 2001 but did not open to the public until
24 2002.

25 54. Plaintiffs are informed and believe that X experienced design and operational
26 problems from its inception.

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

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

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

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

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

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

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

14 **PRIOR INCIDENTS AND NOTICE**

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

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

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

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

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

28 67. 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.

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

69. On June 23, 2022, Christopher Hawley, then 22 years old, rode X2 with his younger brother and cousin.

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

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

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

73. Hawley underwent an emergency right frontotemporoparietal craniotomy.

74. He died the following day.

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

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

77. Accordingly, by July 2026 Six Flags was aware not merely of a theoretical possibility of brain injury, but of actual claims that X2 had caused traumatic brain injury, subdural hematoma, massive intracranial hemorrhage, and death.

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

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

CONCEALMENT OF X2'S INJURY HISTORY

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

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

6 83. Whether healthy passengers had previously suffered catastrophic brain injuries on
7 X2 was material to the decision of a reasonable patron deciding whether to ride.

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

11 85. Six Flags nevertheless did not disclose the relevant history to Pamela Guillen.

12 86. Pamela was not advised that a previous X2 rider had suffered a subdural
13 hematoma and traumatic brain injury.

14 87. She was not advised that Christopher Hawley suffered massive intracranial
15 hemorrhage after riding X2 and died the following day.

16 88. She was not advised of the numerous other catastrophic brain injury claims and
17 lawsuits known to Six Flags.

18 89. Had Pamela been advised that riders had previously suffered catastrophic
19 intracranial hemorrhage, permanent brain damage, coma, or death in connection with X2, she
20 would not have ridden it.

21 **PAMELA GUILLEN – JULY 5, 2026**

22 90. On July 5, 2026, Pamela Guillen visited Six Flags Magic Mountain with her
23 daughter, Camille Katherine Marquez, in connection with Camille's sixteenth birthday.

24 91. Camille wanted to ride X2 and encouraged Pamela to ride with her.

25 92. Pamela agreed.

26 93. Pamela boarded X2, was secured in the manner directed by Defendants, complied
27 with the instructions given to her, and rode X2 in an intended and reasonably foreseeable
28 manner.

1 94. During the ride, Pamela was subjected to sudden, violent, erratic, and excessive
2 forces.

3 95. When the train returned to the station, Camille observed her mother sitting with a
4 vacant stare and her mouth open.

5 96. Camille initially believed Pamela was joking.

6 97. Within moments, Camille realized that her mother's condition was genuine and
7 that something was seriously wrong.

8 98. Pamela attempted to exit X2 but was confused and unstable.

9 99. Camille saw her mother stumble after leaving the ride.

10 100. Pamela's neurological condition rapidly worsened and she collapsed.

11 101. Pamela was transported for emergency medical treatment.

12 102. Imaging revealed a massive intracranial hemorrhage causing life-threatening
13 pressure on her brain.

14 103. Pamela underwent emergency neurosurgery.

15 104. She has subsequently undergone multiple brain surgeries, including craniotomy
16 procedures, to address the intracranial hemorrhage, swelling, pressure, and other consequences
17 of her traumatic brain injury.

18 105. Pamela's treating physicians and surgeons have concluded that her brain trauma
19 resulted from the forces to which she was subjected while riding X2.

20 106. Pamela has sustained catastrophic and permanent neurological injury.

21 **CONTINUED OPERATION AFTER PAMELA'S INJURY**

22 107. Six Flags knew that Pamela Guillen had become profoundly neurologically
23 impaired immediately after riding X2.

24 108. It knew that she stumbled after leaving the ride and collapsed.

25 109. Six Flags knew or thereafter learned that Pamela had sustained massive
26 intracranial hemorrhaging requiring emergency brain surgery.

27 110. This incident occurred against the background of Six Flags' existing knowledge of
28 prior X2 head and brain injuries, including the fatal intracranial hemorrhage suffered by

Christopher Hawley.

111. Under these circumstances, Six Flags knew or should have known that continued operation of X2 presented a risk of another catastrophic brain injury.

112. Six Flags nevertheless continued operating X2 in the days that followed.

113. It did not adequately warn subsequent riders that a 39-year-old woman had suffered a massive intracranial hemorrhage immediately after riding X2 on July 5, 2026.

114. It did not advise subsequent riders that Pamela required emergency neurosurgery.

115. Plaintiffs are informed and believe that Six Flags did not suspend operation of X2 for a sufficient investigation to determine the cause of Pamela's injury before continuing to expose additional members of the public to the ride.

FIRST CAUSE OF ACTION

Strict Product Liability – Design Defect

Against Defendants Magic Mountain, Six Flags Entertainment, Six Flags Theme Parks,

S&S Worldwide, S&S Power, S&S Arrow, and Does 1–100

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

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

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

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

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

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

1 122. The defective condition of X2 was a substantial factor in causing the injuries
2 sustained by Pamela Guillen.

3 123. Plaintiffs seek all resulting damages according to proof.

4 **SECOND CAUSE OF ACTION**

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

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

8 124. Plaintiffs incorporate by reference the foregoing paragraphs as though fully set
9 forth herein.

10 125. At the time Pamela rode X2, the risk that X2 could cause serious or catastrophic
11 head and brain injury was known or knowable in light of the generally recognized and prevailing
12 scientific and technical knowledge available to Defendants.

13 126. Defendants possessed actual knowledge of prior serious head and brain injuries
14 allegedly caused by X2.

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

17 128. Defendants failed to provide adequate warnings concerning these risks.

18 129. Such warnings were feasible and could have been provided without impairing the
19 function of the ride.

20 130. Pamela would not have ridden X2 had she been adequately warned of the risk and
21 prior history of catastrophic brain injury associated with the ride.

22 131. Defendants' failure to provide adequate warnings was a substantial factor in
23 causing Pamela's injuries.

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THIRD CAUSE OF ACTION

Negligent Product Design

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

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

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

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

135. Defendants owed a duty to exercise reasonable care in designing, engineering, testing, producing, manufacturing, inspecting, maintaining, repairing, modifying, servicing, and operating X2.

136. Defendants knew or should have known that a defect in the design or operation of X2 could expose passengers to serious injury.

137. Defendants further knew of prior allegations that X2 passengers had suffered serious head and brain injuries.

138. Defendants breached their duties by failing to reasonably design, redesign, test, modify, inspect, maintain, repair, and operate X2 so as to prevent passengers from being subjected to forces capable of causing catastrophic head and brain injury.

139. Defendants' negligence was a substantial factor in causing the injuries sustained by Pamela Guillen.

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1 **FOURTH CAUSE OF ACTION**

2 **Negligent Failure to Warn**

3 **Against All Defendants**

4 140. Plaintiffs incorporate by reference the foregoing paragraphs as though fully set
5 forth herein.

6 141. Defendants knew or should have known that X2 presented a risk of catastrophic
7 head and brain injury not apparent to ordinary riders.

8 142. Within their respective maintenance, engineering, certification, ride-safety, and
9 patron-safety responsibilities, the Individual Defendants knew or should have known of the risk
10 of catastrophic head and brain injury associated with X2 and owed duties to exercise reasonable
11 care concerning investigation, corrective action, operation, and warnings.

12 143. Defendants possessed information concerning prior incidents, claims, lawsuits,
13 and injuries involving X2 that prospective riders did not possess.

14 144. Defendants owed a duty to provide adequate warnings concerning the known or
15 reasonably knowable risks of X2.

16 145. Defendants breached that duty by failing to warn Pamela of the risk of intracranial
17 hemorrhage, catastrophic traumatic brain injury, permanent neurological impairment, coma, and
18 death.

19 146. Defendants further breached that duty by failing to disclose the history of prior
20 catastrophic brain injuries associated with X2.

21 147. Defendants' negligence was a substantial factor in causing Pamela's injuries.

22 **FIFTH CAUSE OF ACTION**

23 **Negligence / Common Carrier Liability**

24 **Against Defendants Magic Mountain, LLC, Six Flags Entertainment Corporation, Six**
25 **Flags Theme Parks, Inc., and Does 1 through 100**

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

28 149. Defendants Magic Mountain, LLC, Six Flags Entertainment Corporation, Six

Flags Theme Parks, Inc., and those Does that owned, operated, managed, maintained, and/or controlled X2 undertook to transport Pamela aboard X2 (collectively, the "Carrier Defendants").

150. The Carrier Defendants were common carriers and were required to use the utmost care and diligence for Pamela's safe carriage, to provide everything necessary for that purpose, and to exercise a reasonable degree of skill.

151. The Carrier Defendants breached these duties by failing to use the utmost care and diligence for Pamela's safe carriage, including by operating, managing, inspecting, maintaining, and/or controlling X2 in a manner that subjected Pamela to forces capable of causing catastrophic head and brain injury and by failing to take reasonable precautions to prevent such injury.

152. The Carrier Defendants' breaches of duty were a substantial factor in causing the injuries and damages alleged herein.

SIXTH CAUSE OF ACTION

Premises Liability

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

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

154. 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.

155. 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.

156. Defendants knew or should have known of that condition because of the prior injuries, claims, complaints, investigations, and lawsuits involving X2.

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

158. Defendants' negligence was a substantial factor in causing the injuries sustained

by Pamela Guillen.

SEVENTH CAUSE OF ACTION

Fraudulent Concealment

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

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

160. Before Pamela 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.

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

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

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

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

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

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

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

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

169. Plaintiffs are informed and believe that Six Flags knew public disclosure of

1 catastrophic brain injuries associated with X2 would affect the willingness of customers to ride
2 the attraction and thereby affect revenue.

3 170. Six Flags intended that customers, including Pamela, continue to ride X2 without
4 knowledge of the concealed facts.

5 171. Pamela was unaware of these facts.

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

8 173. Had the concealed information been disclosed, Pamela would not have ridden X2.

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

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

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

16 177. Plaintiffs seek punitive and exemplary damages pursuant to Civil Code section
17 3294.

18 **EIGHTH CAUSE OF ACTION**

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

20 **Plaintiff Camille Marquez Against All Defendants**

21 178. Plaintiffs incorporate by reference the foregoing paragraphs as though fully set
22 forth herein.

23 179. Camille Marquez is Pamela Guillen's daughter.

24 180. Camille was physically present during the July 5, 2026 X2 ride and its immediate
25 aftermath.

26 181. Camille contemporaneously perceived the injury-producing event and its
27 immediate consequences.

28 182. When the ride stopped, Camille observed her mother sitting with a vacant stare

and her mouth open.

183. Camille initially believed her mother was joking but immediately realized that Pamela was not behaving normally.

184. Camille personally observed Pamela attempt to exit the ride while confused and unstable.

185. Camille saw Pamela stumble and thereafter collapse.

186. Camille understood at the time that her mother had suffered a serious physical injury associated with the ride they had just taken together.

187. As a result of witnessing the injury to her mother, Camille suffered serious emotional distress beyond that which would be anticipated in a disinterested witness.

188. Defendants' negligence was a substantial factor in causing Camille's emotional distress.

PUNITIVE DAMAGES

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

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

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

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

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

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

195. On July 5, 2026, Pamela Guillen suffered another catastrophic intracranial hemorrhage immediately after riding X2.

196. Six Flags knew that Pamela became neurologically impaired immediately following the ride, stumbled, collapsed, and required emergency medical treatment.

197. Six Flags knew or thereafter learned that Pamela required emergency brain surgery.

198. Nevertheless, Six Flags continued operating X2 without adequately warning subsequent riders or suspending operations pending investigation.

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

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

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

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

DAMAGES

203. As a direct and proximate result of Defendants' conduct, Pamela Guillen suffered catastrophic traumatic brain injury and intracranial hemorrhage requiring multiple brain surgeries, including craniotomies.

204. Pamela has suffered and will continue to suffer physical pain, mental suffering, emotional distress, disability, impairment, disfigurement, inconvenience, and loss of enjoyment of life.

205. Pamela has incurred and will incur medical, hospital, surgical, rehabilitation, therapy, pharmaceutical, attendant-care, life-care, equipment, and related expenses according to proof.

206. Pamela has sustained and will sustain loss of earnings and earning capacity according to proof.

207. Camille Marquez has suffered serious emotional distress as alleged herein.

PRAYER FOR RELIEF

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

1. For general and noneconomic damages according to proof;
2. For past and future medical, hospital, surgical, rehabilitative, therapeutic, pharmaceutical, attendant-care, custodial-care, life-care, equipment, and related expenses according to proof;
3. For past and future loss of earnings and earning capacity according to proof;
4. For damages for physical pain, mental suffering, emotional distress, disability, impairment, disfigurement, inconvenience, and loss of enjoyment of life according to proof;
5. For bystander emotional-distress damages suffered by Camille Marquez according to proof;
6. For punitive and exemplary damages pursuant to Civil Code section 3294 against those Defendants for whom such damages are recoverable;
7. For prejudgment and postjudgment interest as permitted by law;
8. For costs of suit incurred herein; and
9. For such other and further relief as the Court deems just and proper.

DATED: September 21, 2026

DORDICK LAW CORPORATION

By:



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

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DATED: September 21, 2026

By:

COMPLAINT FOR DAMAGES; DEMAND FOR JURY TRIAL