

Gary A. Dordick, Esq. S/B# 128008
Christopher V. Bulone, Esq. S/B# 278882
Anastasia K. Olano, Esq. S/B# 339914
DORDICK LAW CORPORATION
1122 Wilshire Boulevard
Los Angeles, California 90017
Tel: (310) 551-0949 • Fax: (855) 299-4444
E-mail: CVBeservice@dordicklaw.com

Electronically FILED by
Superior Court of California,
County of Los Angeles
9/21/2026 6:39 PM
David W. Slayton,
Executive Officer/Clerk of Court,
By G. Delgado, Deputy Clerk

Attorneys for Plaintiff
MICHAEL WILK, an individual,

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

MICHAEL WILK, an individual,

Plaintiff,

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.: **26ST CV 30013**

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**

[DEMAND FOR JURY TRIAL]

Plaintiff MICHAEL WILK alleges against Defendants, and each of them, as follows:

INTRODUCTION

1. This action arises from a catastrophic brain injury suffered by Plaintiff Michael Wilk while riding the 4th Dimension roller coaster known as X2 (“X2”) at Six Flags Magic

Mountain located on 26101 Magic Mountain Pkwy in Valencia, California.

2. On a weekend day on February 7, 2026, Plaintiff MICHAEL WILK visited Six Flags Magic Mountain with his daughter and grandchildren to build on lasting memories with his family and to enjoy the parks many thrill rides including the X2. While riding the X2, Michael's head began slamming violently against the headrest of his seat. Immediately upon exiting the ride, Michael felt ill, with stabbing pain in his head, dizziness, and had difficulty walking. Michael, an insurance defense attorney with decades of experience, believed at the time that his symptoms would resolve on their own and returned to work the following Monday.

3. In the weeks that followed, Michael's law partners, associates, and even opposing counsel separately observed a continuing decline in his cognitive function and became alarmed, urging him to seek medical care. As a result, Michael went to see his primary care physician on May 12, 2026. Following his appointment, Michael was ordered to obtain and did undergo a brain MRI on June 4, 2026.

4. The MRI revealed massive intracranial bleeding, swelling, and midline shift of the brain. The color variations and striations of the bleeding observed on imaging indicated that a substantial portion of the bleeding had been present for months, consistent with an injury dating back to Michael's February 7, 2026 ride on X2.

5. Subsequently, Michael underwent an emergency embolization procedure, which failed to control the bleeding. Michael thereafter received two separate craniotomies, on June 10, 2026 and June 18, 2026, in an effort to relieve the pressure the bleeding was placing on his brain.

6. Despite receiving medical intervention, Michael continues to suffer debilitating headaches, confusion, dizziness, memory loss, and personality changes. As a result of his injuries, Michael has suffered permanent cognitive impairment and is no longer able to practice law. He lost the decades-long position he held with his law firm

7. But to the owner, operator, manager, and/or those who control Six Flags Magic Mountain ("Six Flags' Owners") as well as those who designed, manufactured, built, installed, inspected, repaired, and maintained X2 ("X2 Designers"), Michael's injury did not occur without warning. For years before that fateful day on February 2026 when Michael entered the Six Flags

1 park, Six Flags' Owners and the X2 Designers (collectively "Six Flags") knew that passengers
2 had been suffering serious head and brain trauma after riding the X2.

3 8. Plaintiff is informed and believes, and thereon alleges, that the Six Flags' Owners
4 and X2 Designers had previously been sued more than a dozen times in actions arising from
5 catastrophic brain injuries allegedly suffered by multiple passengers riding X2 and/or its
6 predecessor configuration, the "X".

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

10 10. On June 23, 2022, 22-year-old Christopher Hawley rode X2 with his brother and
11 cousin. According to allegations subsequently made against Six Flags, the ride was extremely
12 rough and subjected its riders to violent forces. After exiting X2, Hawley walked slowly and
13 with difficulty, used a handrail for support, complained of head pain, collapsed, and lost
14 consciousness. Hospital imaging revealed extensive intracranial hemorrhage, including a
15 massive subdural hematoma and significant brain shift. Hawley then underwent an emergency
16 right frontotemporoparietal craniotomy but died the following day. His death was attributed to
17 head trauma sustained in a park ride accident.

18 11. Six Flags was thereafter sued in 2021 by Sheila Katerelos and in 2023 by the
19 parents of Christopher Hawley with both actions specifically alleging that the X2 caused them
20 catastrophic brain injury and, in the case of Mr. Hawley, death.

21 12. Thus, long before Michael Wilk rode X2, Six Flags had actual knowledge that
22 passengers of the X2 had alleged serious and catastrophic brain injuries arising from the ride,
23 including subdural hemorrhage, traumatic brain injury, and death.

24 13. Despite that history, Six Flags did not warn Michael that riders had previously
25 suffered catastrophic intracranial bleeding, permanent brain damage, coma, or death after riding
26 X2.

27 ///

28 ///

1 14. Six Flags did not warn Michael of Hawley’s 2022 death after he rode the X2.

2 15. Six Flags did not warn Michael of Katerelos 2020 brain injury and subdural
3 hematoma she suffered after riding X2.

4 16. Likewise, Six Flags did not disclose the other multiple prior catastrophic brain
5 injury claims and lawsuits known to it at the time the Plaintiff rode X2.

6 17. Plaintiff is informed and believes, and thereon alleges, that this practice has
7 prevented prospective customers from learning material information concerning prior incidents,
8 injury claims, engineering evidence, ride-safety information, and Six Flags' knowledge
9 concerning the risk of serious injury associated with X2.

10 18. Plaintiff is informed and believes that Six Flags understood that disclosure of
11 prior catastrophic brain injuries associated with X2 would affect whether members of the public
12 chose to ride it and, consequently, the revenues generated by the attraction and the park.

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

16 20. Michael was not given that information.

17 21. Had he been adequately warned of the risk of catastrophic brain injury and the
18 history of prior catastrophic brain injuries associated with X2, he would not have ridden it.

19 **JURISDICTION AND VENUE**

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

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

26 24. This Court has personal jurisdiction over Defendants because each Defendant is
27 authorized to conduct business in California, regularly conducts business in California, has
28 substantial and continuous contacts with California, and/or purposefully avails itself of the

benefits of conducting business in California.

THE PARTIES

25. Plaintiff MICHAEL WILK is an individual and, at all relevant times, was resident of California domiciled in California.

26. Plaintiff is informed and believes, and thereon alleges, 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.

27. Plaintiff is informed and believes, and thereon alleges, 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.

28. Plaintiff is informed and believes, and thereon alleges, 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.

29. Plaintiff is informed and believes, and thereon alleges, 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, inspected, evaluated, and/or possessed specialized engineering knowledge concerning X2 and its trains.

30. Plaintiff is informed and believes, and thereon alleges, that S&S WORLDWIDE, INC. is or was formerly known as and/or did business as S&S Sports Power, Inc., S&S Power, Inc. (S&S Power”), S&S Sports, Inc., and/or S&S Power, Inc., a Delaware corporation, and is a successor in interest to S&S Arrow, LLC, a Utah limited liability company, (S&S Arrow”) in connection with the design of the X2 trains and to Arrow Dynamics, Inc.

31. Plaintiff is informed and believes, and thereon alleges, that Defendants S&S

1 POWER, INC. and S&S ARROW, LLC participated in the design, manufacture, redesign,
2 engineering, production, supply, testing, inspection, certification, modification, and/or servicing
3 of X2, its trains, and its component systems.

4 32. Plaintiff is informed and believes, and thereon alleges, that Defendant TIMOTHY
5 BURKHART served as Vice President of Maintenance and Construction for Six Flags Magic
6 Mountain and was responsible for matters concerning ride maintenance and safety, including X2,
7 during periods relevant to the allegations herein and that is now and that during all relevant times
8 was a California resident domiciled in California.

9 33. Plaintiff is informed and believes, and thereon alleges, that Defendant TIM
10 DOFFLOW served as Director of Maintenance for Six Flags Magic Mountain and had
11 responsibility for maintenance of X2 during periods relevant to the allegations herein and during
12 periods relevant to the allegations herein and that is now and that during all relevant times was a
13 California resident domiciled in California.

14 34. Plaintiff is informed and believes, and thereon alleges, that Defendant JEFFREY
15 D. HUDGINS served as a Corporate Engineer for Six Flags Magic Mountain and had
16 responsibility relating to certification and safety of rides at the park, including X2 and that is
17 now and that during all relevant times was a California resident domiciled in California.

18 35. Plaintiff is informed and believes, and thereon alleges, that Defendant JUSTIN
19 MIYAHIRA served as Manager of Public Safety for Six Flags Magic Mountain and had
20 responsibility relating to patron safety and is now, and that during all relevant times was a
21 California resident domiciled in California.

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

26 37. The true names and capacities of Defendants sued herein as DOES 1 through 100,
27 inclusive, are presently unknown to Plaintiff, who therefore sues said Defendants by such
28 fictitious names. Plaintiff will amend this Complaint to allege their true names and capacities

when ascertained.

38. Plaintiff is informed and believes, and thereon alleges, 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

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

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

41. 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.

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

43. Plaintiff is informed and believes that X experienced design and operational problems from its inception.

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

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

46. Plaintiff is informed and believes that new trains were designed by or through S&S entities, and the ride reopened as X2 in or about May 2008.

47. Plaintiff is informed and believes that X2 thereafter experienced additional mechanical, maintenance, and operational issues.

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

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

50. 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

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

52. Plaintiff is informed and believes that Defendants had reported certain X2 injuries to state safety authorities.

53. Plaintiff is informed and believes that Defendants had also been involved in repeated litigation concerning serious injuries alleged to have resulted from riding X2.

54. Plaintiff is informed and believes that Six Flags and related entities had been sued more than a dozen times before February 2026 in cases arising from catastrophic brain injuries allegedly suffered by X2 passengers.

55. 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.

56. 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.

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

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

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

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

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

62. Hawley underwent an emergency right frontotemporoparietal craniotomy.

63. He died the following day.

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

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

66. Accordingly, by February 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.

67. Plaintiff is informed and believes that additional prior X2 riders had suffered serious head and brain injuries known to Defendants before the incident giving rise to this action.

68. 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

69. Plaintiff is informed and believes that Six Flags has repeatedly sought to restrict public disclosure of evidence concerning X2 injuries and safety issues.

70. Plaintiff is informed and believes that information subject to such suppression efforts has included evidence of prior incidents, injury claims, investigations, engineering and operational matters, maintenance, testing, and Six Flags' knowledge concerning X2.

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

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

73. Plaintiff is informed and believes that Six Flags understood that widespread public knowledge of catastrophic brain injuries associated with X2 could deter members of the public from riding the attraction and thereby adversely affect revenue.

74. Six Flags nevertheless did not disclose the relevant history to Michael Wilk.

75. Michael was not advised that a previous X2 rider had suffered a subdural

1 hematoma and traumatic brain injury.

2 76. He was not advised that Christopher Hawley suffered massive intracranial
3 hemorrhage after riding X2 and died the following day.

4 77. He was not advised of the numerous other catastrophic brain injury claims and
5 lawsuits known to Six Flags.

6 78. Had Michael been advised that riders had previously suffered catastrophic
7 intracranial hemorrhage, permanent brain damage, coma, or death in connection with X2, he
8 would not have ridden it.

9 **MICHAEL WILK – FEBRUARY 7, 2026**

10 79. On February 7, 2026, Michael Wilk visited Six Flags Magic Mountain with his
11 daughter and grandchildren.

12 80. Michael boarded X2, was secured in the manner directed by Defendants,
13 complied with the instructions given to him, and rode X2 in an intended and reasonably
14 foreseeable manner.

15 81. During the ride, Michael was subjected to sudden, violent, erratic, and excessive
16 forces, and felt his head slam against the headrest of his seat.

17 82. Upon exiting the ride, Michael immediately felt ill, experiencing stabbing pain in
18 his head, dizziness, and difficulty walking.

19 83. Believing his symptoms would resolve on their own, Michael returned to work
20 the following Monday.

21 84. Over the following weeks, Michael's cognitive function continued to decline. His
22 law partners, associates, and even opposing counsel separately noticed the change and became
23 alarmed, repeatedly urging him to seek medical attention.

24 85. Michael first sought medical care on May 12, 2026, when he saw his primary care
25 physician.

26 86. Michael was not able to obtain a brain MRI until June 4, 2026.

27 87. The MRI revealed massive intracranial bleeding, swelling, and midline shift of
28 Michael's brain.

1 88. The color variations and striations of the bleeding observed on imaging indicated
2 that a substantial portion of the hemorrhage had been present for months, consistent with an
3 injury sustained on February 7, 2026.

4 89. Michael underwent an emergency embolization procedure in an effort to stop the
5 bleeding, which failed.

6 90. Michael thereafter underwent a craniotomy on June 10, 2026, and a second
7 craniotomy on June 18, 2026, in an effort to relieve the pressure the bleeding was placing on his
8 brain.

9 91. As a result of his injuries, Michael has sustained permanent cognitive impairment.

10 92. Michael is no longer able to practice law and has lost the decades-long position he
11 held with his law firm.

12 93. Michael continues to suffer debilitating headaches, confusion, dizziness, memory
13 loss, and personality changes.

14 94. Michael's treating physicians have concluded that his catastrophic brain injury
15 resulted from the forces to which he was subjected while riding X2 on February 7, 2026.

16 **FIRST CAUSE OF ACTION**

17 **Strict Product Liability – Design Defect**

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

20 95. Plaintiff incorporates by reference the foregoing paragraphs as though fully set
21 forth herein.

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

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

27 98. An ordinary consumer would not expect that riding X2 in the manner intended
28 could cause massive intracranial hemorrhage, traumatic brain injury, permanent neurological

1 impairment, coma, or death.

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

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

6 101. The defective condition of X2 was a substantial factor in causing the injuries
7 sustained by Michael Wilk.

8 102. Plaintiff seeks all resulting damages according to proof.

9 **SECOND CAUSE OF ACTION**

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

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

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

13 103. Plaintiff incorporates by reference the foregoing paragraphs as though fully set
14 forth herein.

15 104. At the time Michael rode X2, the risk that X2 could cause serious or catastrophic
16 head and brain injury was known or knowable in light of the generally recognized and prevailing
17 scientific and technical knowledge available to Defendants.

18 105. Defendants possessed actual knowledge of prior serious head and brain injuries
19 allegedly caused by X2.

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

22 107. Defendants failed to provide adequate warnings concerning these risks.

23 108. Such warnings were feasible and could have been provided without impairing the
24 function of the ride.

25 109. Michael would not have ridden X2 had he been adequately warned of the risk and
26 prior history of catastrophic brain injury associated with the ride.

27 110. Defendants' failure to provide adequate warnings was a substantial factor in
28 causing Michael's injuries.

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**

111. Plaintiff incorporates by reference the foregoing paragraphs as though fully set forth herein.

112. 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.

113. 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.

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

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

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

117. 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.

118. Defendants' negligence was a substantial factor in causing the injuries sustained by Michael Wilk.

///

///

1 **FOURTH CAUSE OF ACTION**

2 **Negligent Failure to Warn**

3 **Against All Defendants**

4 119. Plaintiff incorporates by reference the foregoing paragraphs as though fully set
5 forth herein.

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

8 121. 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.

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

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

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

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

21 126. Defendants' negligence was a substantial factor in causing Michael'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**

26 127. Plaintiff incorporates by reference the foregoing paragraphs as though fully set
27 forth herein.

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

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

129. The Carrier Defendants were common carriers and owed Michael the highest duty of care for his safe carriage.

130. The Carrier Defendants breached that duty by failing to use the utmost care and diligence in operating, inspecting, maintaining, and controlling X2 and by subjecting Michael to forces capable of causing catastrophic head and brain injury.

131. The Carrier Defendants' breach of duty was a substantial factor in causing Michael's injuries and damages.

SIXTH CAUSE OF ACTION

Premises Liability

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

132. Plaintiff incorporates by reference the foregoing paragraphs as though fully set forth herein.

133. 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.

134. 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.

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

136. Defendants failed to correct the dangerous condition and failed to adequately warn Plaintiff of it.

137. Defendants' negligence was a substantial factor in causing the injuries sustained by Michael Wilk.

///

///

1 **SEVENTH CAUSE OF ACTION**

2 **Fraudulent Concealment**

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

5 138. Plaintiff incorporates by reference the foregoing paragraphs as though fully set
6 forth herein.

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

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

12 141. Plaintiff is informed and believes that Six Flags had been sued more than a dozen
13 times as a result of catastrophic brain injuries allegedly suffered on X2.

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

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

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

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

24 146. Six Flags intentionally failed to disclose these material facts.

25 147. Plaintiff is informed and believes that Six Flags has also sought to prevent
26 information concerning X2 injuries from becoming publicly available.

27 ///

28 ///

148. Plaintiff is informed and believes that Six Flags knew public disclosure of catastrophic brain injuries associated with X2 would affect the willingness of customers to ride the attraction and thereby affect revenue.

149. Six Flags intended that customers, including Michael, continue to ride X2 without knowledge of the concealed facts.

150. Michael was unaware of these facts.

151. He reasonably relied upon Six Flags' representations and nondisclosures concerning the ride and its risks.

152. Had the concealed information been disclosed, Michael would not have ridden
X2.

153. Six Flags' concealment was a substantial factor in causing his injuries.

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

155. Plaintiff is informed and believes that the acts and omissions alleged herein were committed, authorized, directed, adopted, and/or ratified by officers, directors, and managing agents of the corporate Defendants with authority over ride safety, operation, warnings, claims, litigation, and continued operation of X2.

156. Plaintiff seeks punitive and exemplary damages pursuant to Civil Code section 3294.

PUNITIVE DAMAGES

157. Plaintiff incorporates by reference the foregoing paragraphs as though fully set forth herein.

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

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

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

1 170. Michael has lost his decades-long position as an attorney with his law firm and is
2 no longer able to practice law.

3 171. Michael has sustained and will sustain loss of earnings and earning capacity
4 according to proof.

5 **PRAYER FOR RELIEF**

6 WHEREFORE, Plaintiff prays for judgment against Defendants, and each of them, as
7 follows:

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

21
22 DATED: September 21, 2026

DORDICK LAW CORPORATION

23
24 By:


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

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

DATED: September 21, 2026

By:

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