

1 **LEWIS BRISBOIS BISGAARD & SMITH LLP**

ERIC Y. KIZIRIAN, SB# 210584

2 E-Mail: Eric.Kizirian@lewisbrisbois.com

ZOURIK ZARIFIAN, SB# 306368

3 E-Mail: Zourik.Zarifian@lewisbrisbois.com

633 West 5th Street, Suite 4000

4 Los Angeles, California 90071

Telephone: 213.250.1800

5 Facsimile: 213.250.7900

6 Attorneys for Plaintiff-Stakeholder,
FERRARI NORTH AMERICA, INC.

8 UNITED STATES DISTRICT COURT

9 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

11 FERRARI NORTH AMERICA, INC.,

12 PLAINTIFF-
13 STAKEHOLDER,

14 VS.

15 MANFRED MAURICIO QUINTANILLA
HERNANDEZ AND SMYTHE VOLVO
16 VELOCE, INC., A NEW JERSEY
CORPORATION DOING BUSINESS AS
ASTON MARTIN SUMMIT,

17 DEFENDANTS-
18 CLAIMANTS.

Case No. 2:26-cv-12111

INTERPLEADER COMPLAINT

19
20 The Plaintiff-Stakeholder, Ferrari North America, Inc. (“FNA”), by and
21 through its counsel of record and pursuant to 28 USC § 1335, files this Interpleader
22 Complaint against the Defendants-Claimants Manfred Mauricio Quintanilla
23 Hernandez (“Hernandez”), a resident and citizen of the State of California, and
24 Smythe Volvo Veloce, Inc., a New Jersey Corporation doing business as Aston Martin
25 Summit (“Smythe”), and alleges the following action to determine the rightful
26 ownership of Hernandez and/or Smythe to the Manufacturer’s Statement of Origin
27 (“MSO”) for a 2020 Ferrari Monza SP2 vehicle bearing vehicle identification number
28 (“VIN”) ZFF94MSB000254682 (“Subject Vehicle”).

1 **PARTIES**

2 1. Plaintiff-Stakeholder Ferrari North America, Inc. is, and at all relevant
3 times was, a corporation duly organized and existing under the laws of the State of
4 Delaware, with its principal place of business in Englewood Cliffs, New Jersey.

5 2. Upon information and belief, Defendant and Claimant Manfred Mauricio
6 Quintanilla Hernandez is a citizen and resident of the City of Los Angeles, County of
7 Los Angeles, in the State of California.

8 3. Upon information and belief, Defendant and Claimant Smythe Volvo
9 Veloce, Inc., a New Jersey Corporation doing business as Aston Martin Summit, is a
10 New Jersey corporation with its principal place of business in New Jersey.

11 4. FNA is informed and believes, and on that basis alleges, that Hernandez
12 and Smythe assert or may assert competing and adverse claims concerning ownership
13 of and entitlement to certain documents relating to the Subject Vehicle, including the
14 MSO of that vehicle.

15 **JURISDICTION AND VENUE**

16 5. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1335.

17 6. The MSO constitutes property and/or an instrument having a value in
18 excess of \$500. The MSO is a document required to be able to register and/or title
19 the Subject Vehicle, which has a value of more than \$2 Million.

20 7. Two or more adverse claimants of diverse citizenship are claiming or
21 may claim entitlement to the MSO.

22 8. Manfred Mauricio Quintanilla Hernandez is, upon information and
23 belief, a citizen and resident of the City of Los Angeles, County of Los Angeles, in
24 the State of California.

25 9. Smythe Volvo Veloce, Inc., a New Jersey Corporation doing business as
26 Aston Martin Summit, is, upon information and belief, a citizen of the State of New
27 Jersey.

28 ///

10. Accordingly, two or more adverse Claimants of diverse citizenship are asserting, or may assert, competing claims to the MSO within the meaning of 28 U.S.C. § 1335(a)(1).

11. Minimal diversity exists between the adverse Claimants because Hernandez and Smythe are citizens of different States.

12. FNA is prepared to deposit the original MSO into the registry of this Court, or otherwise deliver the MSO to such custodian as the Court may designate, subject to further order of the Court.

13. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1397 because one or more Claimants reside in this district and because a substantial part of the events giving rise to the controversy occurred in this district.

GENERAL ALLEGATIONS

14. This Interpleader action concerns the MSO associated with the Subject Vehicle bearing VIN ZFF94MSB000254682.

15. The MSO is a manufacturer generated ownership document customarily utilized in connection with the initial titling and registration of a motor vehicle.

16. A motor vehicle generally cannot be legally registered and titled with a Department of Motor Vehicles in any State without an MSO.

17. FNA has maintained possession of the MSO since October 2024 and currently remains in possession, custody, and control of the MSO.

18. FNA does not claim any ownership interest in the Subject Vehicle itself and does not claim any beneficial interest in the MSO adverse to any Claimant.

19. FNA serves only as a neutral stakeholder with respect to the MSO.

20. FNA is informed and believes that Hernandez contends he remains the rightful owner of the Subject Vehicle and is entitled to receive the MSO.

/ / /

/ / /

/ / /

1 21. FNA is further informed and believes that Smythe claims rights arising
2 from transactions involving its purported purchase of the Subject Vehicle from
3 Hernandez and may contend that it is entitled to possession of the MSO or otherwise
4 entitled to direct disposition of the MSO to another third party to whom or which it
5 may have sold or otherwise transferred the Subject Vehicle.

6 22. FNA is informed and believes that litigation concerning ownership rights
7 and interests in the Subject Vehicle is presently pending in Orange County Superior
8 Court between, among others, Hernandez and Smythe. The Orange County Superior
9 Court State court action case number is 30-2025-01474178 (“OC Action”).

10 23. FNA is informed and believes that the claims being litigated in the OC
11 Action directly concern or implicate a dispute between or among Hernandez and/or
12 Smythe concerning the ownership, possession, and competing interests in the Subject
13 Vehicle.

14 24. As a result of the competing positions asserted or potentially asserted by
15 Hernandez and Smythe, FNA is exposed to multiple liability and multiple litigation if
16 it independently determines to whom the MSO should be delivered.

17 25. If FNA were to deliver the MSO to one Claimant, FNA reasonably
18 believes it may be subjected to claims by another Claimant asserting superior rights
19 to the same document.

20 26. FNA cannot safely determine, without risk of liability, which Claimant
21 is legally entitled to possession of the MSO.

22 27. FNA has not acted in collusion with any Claimant and brings this
23 Interpleader action in good faith solely to resolve competing claims to the MSO for
24 which FNA has no independent right or interest.

25 28. FNA is ready, willing, and able to deposit the original MSO with the
26 Court or otherwise deliver the MSO in accordance with any order issued by this Court.

27 ///

28 ///

FIRST CLAIM FOR RELIEF
INTERPLEADER (28 USC § 1335)

29. FNA incorporates by reference paragraphs 1 through 28 as though fully set forth herein.

30. The MSO constitutes property having a value in excess of \$500 within the meaning of 28 U.S.C. § 1335.

31. Adverse and competing claims have been made, or may be made, against FNA concerning entitlement to, possession, control, and/or disposition of the MSO.

32. FNA claims no beneficial interest in the MSO.

33. FNA does not concede that either Claimant is entitled to the MSO, but rather, FNA faces competing demands concerning the MSO document.

34. FNA cannot determine the validity or priority of the competing claims without exposing itself to multiple liability, inconsistent obligations, or additional litigation.

35. FNA is a disinterested stakeholder and is ready and willing to deposit the MSO with the Court pending adjudication of the Claimant-Defendants' respective rights.

36. An actual controversy exists concerning which Claimant is legally entitled to receive the MSO.

37. Interpleader relief is necessary and appropriate so the Claimants may litigate among themselves their respective rights concerning the MSO and so that FNA may avoid multiple liability and inconsistent obligations.

38. FNA is prepared to deposit the original MSO into the registry of this Court, or otherwise deliver the MSO in accordance with such procedures as the Court directs, pending adjudication of the competing claims of Hernandez and Smythe.

///

///

///

PRAYER FOR RELIEF

WHEREFORE, Ferrari North America, Inc. prays for judgment as follows:

- A. That Hernandez and Smythe be required to interplead and litigate among themselves their respective rights, if any, to the Manufacturer's Statement of Origin for the Subject Vehicle;
- B. That FNA be authorized to deposit the original MSO with the Clerk of the Court, Court registry, or such other custodian as the Court may designate;
- C. That upon deposit of the MSO, FNA be discharged from any and all liability relating to possession, custody, control, release, transfer, or delivery of the MSO;
- D. That the Court determine the respective rights of Hernandez and Smythe to the MSO;
- E. That Hernandez, Smythe, and all persons acting in concert with them be enjoined from commencing or prosecuting any action against FNA relating to entitlement to or disposition of the MSO; and
- F. For such other and further relief as the Court deems just and proper.

Dated: October 16, 2026

LEWIS BRISBOIS BISGAARD & SMITH LLP

By: 

Eric Y. Kizirian

Zourik Zarifian

Attorneys for Plaintiff-Stakeholder,
Ferrari North America, Inc.