

**IN THE COURT OF COMMON PLEAS OF FRANKLIN COUNTY, OHIO
CIVIL DIVISION**

RAGHDA AL SAFORI
5458 Kenneylane Boulevard
Columbus, Ohio 43235

Plaintiff,

vs.

VANNETTE ANNANG
1753 Norma Road
Columbus, Ohio 43229

and

EBENEZER ANNANG
1753 Norma Road
Columbus, Ohio 43229

and

OHIO DEPARTMENT OF MEDICAID
c/o Maureen M. Corcoran, Director
50 West Town Street, Suite 400
Columbus, Ohio 43215

Defendants.

**COMPLAINT WITH JURY DEMAND
ENDORSED HEREON**

COMPLAINT

FIRST CLAIM - NEGLIGENCE

1. On or about October 23, 2024, in Columbus, Franklin County, Ohio, Defendant Vannette Annang negligently operated a motor vehicle by failing to yield while attempting to execute a left turn.
2. At all times pertinent to the foregoing, Defendant Ebenezer Annang negligently entrusted the vehicle to Defendant Vannette Annang.
3. As a direct and proximate result of Defendants' negligence, the vehicle operated by Defendant Vannette Annang collided with the vehicle lawfully operated by Plaintiff Raghda Al Safori at

the intersection of Karl Road and Norma Road.

4. As a direct and proximate result of Defendants' negligence, Plaintiff Raghda Al Safori suffered permanent injuries and damages to her body, including but not limited to her head, neck, back, hip, knee, ankle and other parts of her body, causing physical pain, suffering, discomfort, emotional and mental distress, loss of enjoyment of life, physical impairment and inability to perform ordinary activities, all of which and will continue to cause her to endure substantial pain and suffering.
5. As a direct and proximate result of Defendants' negligence, Plaintiff Raghda Al Safori has incurred bills for necessary services in an amount undetermined at present and expects to incur additional such expenses into the indefinite future.
6. As a direct and proximate result of Defendants' negligence, Plaintiff Raghda Al Safori has lost income and will lose income into the indefinite future.

SECOND CLAIM – MEDICAID SUBROGATION

7. Plaintiff Raghda Al Safori hereby incorporates each and every allegation contained in paragraphs one (1) through six (6) of this Complaint as if fully rewritten herein.
8. Defendant Ohio Department of Medicaid (hereinafter "Medicaid") paid medical bills on behalf of Plaintiff Raghda Al Safori for treatment related to injuries suffered in the collision described herein.
9. Medicaid has asserted or is expected to assert a statutory right of subrogation pursuant to Ohio R.C. §§ 5160.37 and 5160.38 regarding any financial recovery that Plaintiff Raghda Al Safori may receive.
10. Medicaid is a necessary party to this action.

WHEREFORE, Plaintiff requests judgment against Defendants as follows:

- I. On the First Claim, judgment against Defendants, jointly and severally, in an amount to be determined in excess of Twenty-Five Thousand Dollars \$25,000.00;

- II. On the Second Claim, judgment that Medicaid assert and prove the legal, factual, contractual and statutory basis for its lien/subrogation interest and the Court determine the legal subrogation rights of Medicaid;
- III. Interest (pre- and post-judgment), costs and attorney fees;
- IV. For any and all other such relief to which Plaintiff may be entitled at equity or in law.

Respectfully Submitted,

/s/ Jordan D. Thomas, Esq.

Jordan D. Thomas, Esq. (0103155)

Paul W. Steele (0081043)

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Counsel for Plaintiff

JURY DEMAND

Now comes Plaintiff, by and through counsel, and demand trial of the within cause to a jury of eight (8) persons.

/s/ Jordan D. Thomas, Esq.

Jordan D. Thomas (0103155)

Paul W. Steele (0081043)

Counsel for Plaintiff