

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

ANITA CARTER
4274 Conover Pl.
Columbus, Ohio 43227

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:

Case No.:

Plaintiff,

:

Judge:

vs.

:

RICKIE M. AMPUDIA
847 Broadleigh Rd.
Columbus, Ohio 43209

:

:

and

:

JOHN DOE
Name Unknown
847 Broadleigh Rd.
Columbus, Ohio 43209

:

:

Defendants.

:

COMPLAINT

(Jury Demand Endorsed Hereon)

1. At all times relevant herein, Plaintiff Anita Carter was a citizen and resident of Franklin County, Ohio.
2. At all times relevant herein, Defendant Rickie M. Ampudia was a citizen and resident of Franklin County, Ohio.
3. At all times relevant herein, Defendant John Doe's true name is not known to Plaintiff. Plaintiff has conducted a reasonable and diligent search for the true identity of Defendant John Doe but has not been able to identify the name of said Defendant.

4. Jurisdiction and venue are appropriate for the Franklin County Court of Common Pleas.
5. On or about June 15, 2023, Plaintiff Anita Carter was operating a motor vehicle traveling east on E. Livingston Ave., at or near the intersection with S. Yearling Rd., in the City of Columbus, Franklin County, Ohio.
6. At the same time and place, Defendant Rickie M. Ampudia and/or Defendant John Doe was operating a motor vehicle traveling east on E. Livingston Ave., at or near the intersection with S. Yearling Rd., in the City of Columbus, Franklin County, Ohio, when she negligently changed lanes, striking the vehicle operated by Plaintiff.
7. Defendant Rickie M. Ampudia and/or Defendant John Doe carelessly and negligently operated a motor vehicle by failing to drive within a single lane and/or changing lanes without first ascertaining that the movement could be made with safety and/or failing to yield to the vehicle operated by Plaintiff and/or failing to overtake and pass with safety and/or failing to maintain control and/or failing to maintain a proper lookout and/or engaging in a distracting activity and/or failing to warn of her intention to change lanes, and otherwise operated her vehicle in an unsafe and negligent manner, thereby causing the vehicle she was operating to collide into the vehicle operated by Plaintiff Anita Carter.
8. Defendant Rickie M. Ampudia was issued a citation for violating Columbus City Code Section 2131.08(A) for failing to drive within a single lane and/or changing lanes without first ascertaining that the movement could be made with safety.

9. As a direct and proximate result of the negligence of Defendant Rickie M. Ampudia and/or Defendant John Doe, Plaintiff Anita Carter sustained multiple injuries to body and mind, including but not limited to her knees, back, chest, and neck, necessitating medical treatment from the time of the collision, to the present, and into the future.
10. Plaintiff Anita Carter's injuries have caused, and will cause in the future, pain and suffering of body and mind.
11. As a direct and proximate result of the negligence of Defendant Rickie M. Ampudia and/or Defendant John Doe, Plaintiff Anita Carter incurred reasonable and necessary medical expenses exceeding \$11,000.00 and may continue to incur future medical expenses.
12. It is believed that some or all of the injuries suffered by Plaintiff Anita Carter are permanent in nature and that the pain and suffering of body and mind that resulted from these injuries is continuing and will continue into the future.
13. As a direct and proximate result of the negligence of Defendant Rickie M. Ampudia and/or Defendant John Doe, Plaintiff Anita Carter sustained a loss of income and/or a loss in the ability to earn income.
14. As a direct and proximate result of the negligence of Defendant Rickie M. Ampudia and/or Defendant John Doe, Plaintiff Anita Carter sustained a loss of enjoyment of life.

WHEREFORE, Plaintiff Anita Carter demands judgment against Defendant Rickie M. Ampudia and/or Defendant John Doe in an amount in excess of twenty-five thousand

dollars (\$25,000.00), plus court costs and interest to be assessed from the date of the subject collision, and any other relief in law and/or equity to which Plaintiff may be entitled.

Respectfully Submitted,

/s/ Matthew E. Ice

Matthew E. Ice

Attorney Registration Number: 0066929

Attorney for Plaintiff Anita Carter

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JURY DEMAND

Plaintiff Anita Carter hereby demands that the within cause be heard by a jury of not less than eight (8) persons.

/s/ Matthew E. Ice

Matthew E. Ice (0066929)

Attorney for Plaintiff Anita Carter