

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

Savannah Williams,
9503 Knarwood Court
Pickerington, Ohio 43147

Plaintiff,

vs.

Belinda Abbruzzese,
8524 Autumn Lane
West Chester, Ohio 45069

Defendant.

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Case No. _____

Judge _____

PLAINTIFF SAVANNAH WILLIAMS' COMPLAINT

NOW COMES Plaintiff Savannah Williams, by and through counsel, and for her Complaint against Defendant Belinda Abbruzzese, states and avers as follows:

1. Plaintiff Savannah Williams is an individual who currently resides in Pickerington, Franklin County, Ohio.

2. Upon information and belief, Defendant Belinda Abbruzzese is an individual who currently resides in West Chester, Butler County, Ohio.

3. The events that give rise to this Complaint occurred on or about November 14, 2023 in Pickerington, Franklin County, Ohio.

4. Pursuant to R.C. 2305.01, this Court has proper subject matter jurisdiction over all parties.

5. Pursuant to Civ.R. 3(C)(1), (2) and (6), venue in this Court is proper.

COUNT ONE
(Personal Injury/Negligence of Defendant Belinda Abbruzzese)

6. Plaintiff adopts and incorporates by reference each preceding paragraph the same as if fully rewritten herein.

7. On or about November 14, 2023, Plaintiff Savannah Williams was lawfully operating a motor vehicle in the middle northbound lane of State Route 256 near the intersection of Interstate 70.

8. On or about November 14, 2023, at the same approximate time and place of the events stated in Paragraph 7, Defendant Belinda Abbruzzese was operating a motor vehicle in the left turn lane also heading northbound on State Route 256 near the intersection of Interstate 70.

9. Following the events stated in Paragraphs 7 and 8, suddenly, and without warning, Defendant Belinda Abbruzzese made an improper lane change and crashed directly into the vehicle being operated by Plaintiff Savannah Williams.

10. Immediately following the events stated in Paragraphs 7,8, and 9, the initial impact was so great that the vehicle being operated by Plaintiff Savannah Williams was forced into the right lane of State Route 256, which caused a second crash to occur involving the motor vehicle being operated by Plaintiff Savannah Williams and a vehicle being operated by Joseph Griesenbrock.

11. Following the events described in Paragraphs 7, 8, 9, and 10, Defendant Belinda Abbruzzese unlawfully, negligently, recklessly, and/or with actual malice operated a motor vehicle and failed to operate her motor vehicle within marked lanes or continuous lines of traffic.

12. The actions and/or omissions of Defendant Belinda Abbruzzese described in Paragraphs 9 and 11 directly and proximately caused the motor vehicle that she was operating to collide with the motor vehicle being operated by Plaintiff Savannah Williams, and subsequently caused the motor vehicle being operated by Plaintiff Savannah Williams to collide with the motor vehicle being operated by Joseph Griesenbrock (hereinafter "subject collisions").

13. The force and impact of the subject collisions caused damage to the motor vehicle that Plaintiff Savannah Williams was operating.

14. At all times relevant herein, Plaintiff Savannah Williams operated her motor vehicle in a reasonable and prudent manner, in accordance with the motor vehicle laws of the State of Ohio.

15. The actions and/or omissions of Defendant Belinda Abbruzzese were unlawful, negligent, and/or reckless as to the others lawfully using the public streets at the time of the subject collision, including Plaintiff Savannah Williams.

16. The actions and/or omissions of Defendant Belinda Abbruzzese constitute actual malice.

17. As a direct and proximate cause result of the negligence, recklessness, and/or actual malice of Defendant Belinda Abbruzzese, Plaintiff Savannah Williams sustained extensive temporary and permanent injuries; suffered great physical pain and suffering, mental anguish, and the loss and enjoyment of life and will continue to suffer such damages in the future, her injuries being permanent in nature; that she is subject to increased risk of harm; that she incurred large sums of money for medical expenses for treatment of said injuries and will be required to incur additional large sums of money for

medical expenses in the future, her injuries being permanent in nature; that she was prevented from transacting her business; and that she was unable to perform her usual activities and live a normal way of life.

18. The negligence, recklessness, and/or actual malice of Defendant Belinda Abbruzzese caused indivisible harm to Plaintiff Savannah Williams.

COUNT TWO
(Negligence per Se of Defendant Belinda Abbruzzese)

19. Plaintiff adopts and incorporates by reference each preceding paragraph the same as if fully rewritten herein.

20. The actions and/or omissions of Defendant Belinda Abbruzzese constitute violations of R.C. 4511.12, 4511.20, 4511.204, 4511.21, 4511.25, 4511.33, 4511.79, 4511.991, and corresponding City Code of Pickerington, Ohio.

21. A violation of the above-referenced sections and subsections of the Ohio Revised Code and/or City Code of Pickerington, Ohio constitutes negligence per se under Ohio law.

22. In Pickerington Mayor's Court Case No. 23TRD00680, Defendant Belinda Abbruzzese was charged with violating Pickerington, Ohio City Code §432.08, Driving Within Lanes or Continuous Lines of Traffic, and was found guilty of that violation by the Pickerington Mayor's Court.

23. The injuries and damages sustained by Plaintiff Savannah Williams are of the type which the above-referenced statutes and ordinances seek to prevent.

24. The injuries and damages sustained by Plaintiff Savannah Williams were directly and proximately caused by Defendant Belinda Abbruzzese's violations of one or more the above-referenced statutes and ordinances.

25. As a direct and proximate result of the Defendant Abbruzzese's violations of Ohio law and negligence per se, Plaintiff Savannah Williams sustained the injuries and damages stated herein.

WHEREFORE Plaintiff Savannah Williams prays for the following relief:

As to **COUNT ONE**, Plaintiff Savannah Williams demands judgment against Defendant Belinda Abbruzzese for compensatory damages in an amount in excess of twenty-five thousand dollars (\$25,000.00), for punitive and exemplary damages, for pre-judgment interest and post-judgment interest, for her reasonable attorney fees, and for her costs incurred herein, and for such relief as this Court deems proper.

As to **COUNT TWO**, Plaintiff Savannah Williams demands judgment against Defendant Belinda Abbruzzese for compensatory damages in an amount in excess of twenty-five thousand dollars (\$25,000.00), for pre-judgment interest and post-judgment interest, for her reasonable attorney fees, for her costs incurred herein, and for such relief as this Court deems proper.

Respectfully submitted,

/s/ Michael L. Benson

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