

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

NICOLE MILLER
22 North 22nd Street
Newark, Ohio 43055

:

:

Plaintiff,

:

CASE NO:

-vs-

:

JUDGE:

DANIELLE M. GLUZMAN
406 East Northwood Avenue
Columbus, Ohio 43201

:

:

and

:

620 Lovers Lane
Steubenville, OH 43953

:

COMPLAINT

:

(Jury Demand Endorsed Hereon)

Defendant.

:

Now comes Plaintiff, Nicole Miller, by and through the undersigned counsel, and for her Complaint against Defendant sets forth the following claims and averments:

PARTIES AND JURISDICTION

1. At all relevant times herein, Plaintiff, Nicole Miller, was a citizen and resident of Licking County, Ohio.
2. At all relevant times, Defendant, Danielle M. Gluzman, was a citizen and resident of Franklin County, Ohio.
3. At all times relevant herein, all of the material factual events occurred within Franklin County, Ohio.
4. Pursuant to Ohio Civ. R. 3, jurisdiction and venue are appropriate for the Franklin County Court of Common Pleas, Ohio.

FACTUAL BACKGROUND

5. Plaintiff restates and incorporates by reference the preceding paragraphs as though fully rewritten herein.
6. On or about June 12, 2023, Plaintiff, Nicole Miller, was lawfully operating a motor vehicle southbound on Interstate Route 71 in the City of Columbus, Franklin County, Ohio.
7. At or around the same time, Defendant, Danielle M. Gluzman, was negligently, recklessly, and maliciously operating a motor vehicle southbound on Interstate Route 71 in the City of Columbus, Ohio, when Defendant attempted to merge into the same lane of travel as Plaintiff, causing a collision between the vehicle operated by Plaintiff and the vehicle operated by Defendant.
8. Defendant, Danielle M. Gluzman, fled the scene of the accident.
9. As a result of Defendant's negligent, reckless, and malicious driving, Defendant, Danielle M. Gluzman, was issued a citation by the Columbus Police Department for changing lanes without safety in violation of Section 2131.08(A)(1) of the Columbus City Code.
10. Defendant, Danielle M. Gluzman, was also charged with failure to stop after an accident in violation of Section 2135.12(A) of the Columbus City Code, in the Franklin County Municipal Court. Ultimately, Defendant pled guilty to an amended charge of reckless operation of a motor vehicle in willful or wanton disregard of the safety of persons or property (O.R.C. § 4511.20).

COUNT ONE

11. Plaintiff restates and incorporates by reference the preceding paragraphs as though fully rewritten herein.

12. As a direct and proximate result of Defendant, Danielle M. Gluzman's negligent, reckless, and malicious conduct, Plaintiff, Nicole Miller, sustained multiple injuries necessitating medical treatment.
13. As a direct and proximate result of Defendant, Danielle M. Gluzman's negligent, reckless, and malicious conduct, Plaintiff, Nicole Miller, incurred reasonable and necessary medical expenses, and may incur additional medical expenses in the future.
14. As a direct and proximate result of Defendant, Danielle M. Gluzman's negligent, reckless, and malicious conduct, Plaintiff, Nicole Miller, sustained, and may continue to sustain, economic loss and noneconomic losses, including pain, suffering, and emotional distress.
15. As a further direct and proximate result of the negligent, reckless, and malicious conduct of Defendant, Danielle M. Gluzman, Plaintiff, Nicole Miller, incurred both temporary and permanent disability, the inability to perform usual and daily tasks, and loss of enjoyment of life. Plaintiff, Nicole Miller, expects these conditions to continue permanently in the future as a result of the injuries she suffered from the accident caused by Defendant, Danielle M. Gluzman.
16. As a further direct and proximate result of the negligent, reckless, and malicious conduct by Defendant, Danielle M. Gluzman, Plaintiff, Nicole Miller, has incurred, and may further incur in the future, other incidental expenses that she would not have otherwise incurred in the absence of the conduct of Defendant.

WHEREFORE, Plaintiff, Nicole Miller, demands judgment against Defendant, in an amount to be determined at trial and in excess of \$25,000.00 (twenty-five thousand and 00/100 dollars) along with all prejudgment interest, post-judgment interest, costs, attorney fees, interest, punitive damages, and all other relief to which Plaintiff, Nicole Miller, may be entitled under the law and that this Court deems reasonable, equitable, and proper.

Respectfully submitted,

THE TYACK LAW FIRM CO., L.P.A.

/s/ Jonathan T. Tyack

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Counsel for Plaintiff, Nicole Miller

JURY DEMAND

Plaintiff, Nicole Miller, hereby demands a jury of eight (8) for all claims set forth in her Complaint against Defendant.

/s/ Jonathan T. Tyack

Jonathan T. Tyack (0066329)

THE TYACK LAW FIRM CO., L.P.A.

Counsel for Plaintiff, Nicole Miller