

IN THE COURT OF COMMON PLEAS, MUSKINGUM COUNTY, OHIO

ELTON JONES 575 Bayou Paul Lane St. Gabriel, LA 70776	:	
	:	CASE NO.
Plaintiff,	:	
vs.	:	
LOVE’S TRAVEL STOPS & COUNTRY STORES, INC. c/o CT Corporation Systems 4400 Easton Commons Way Suite 125 Columbus, OH 43219	:	JUDGE
	:	JURY DEMAND ENDORSED HEREIN
Defendant.	:	

COMPLAINT

FIRST CLAIM FOR RELIEF:

1. The Defendant, Love’s Travel Stops & Country Stores, Inc., (hereinafter referred to as “Love’s”) is a foreign corporation registered and authorized to transact business in Ohio under charter number 4171137.
2. Defendant Love’s, owns, operates and manages a retail establishment located at 3605 Sonora Road, Zanesville, Ohio 43701 (Store #221).
3. Plaintiff, Elton Jones, is the owner and operator of a 2014 Freightliner Truck, VIN # FSUL2865.
4. On June 22, 2023, Plaintiff, Elton Jones, took his vehicle to Love’s store #221, for an oil change.
5. Plaintiff Jones drove approximately 50 miles after the oil change, before the vehicle’s engine shut down completely.

6. Upon tow, and inspection, it was discovered that during the oil change, Defendant Love's had negligently left a plastic bag in the engine, which lead to the breakdown of the engine.
7. The breakdown of Plaintiff's vehicle was proximately caused by the negligence of Love's during the oil change.
8. Defendant Love's, by and through their employees/agents, negligently failed to inspect the engine fully before deeming the inspection complete, which damaged the engine, endangered the life and limb of Plaintiff as he drove the vehicle, and disabling the vehicle fully, requiring full replacement of the engine.
9. The incident occurring on June 22, 2023, was caused by the negligence of Defendant Love's and/or their employees/agents.
10. As a direct and proximate result of the negligence of the Defendant Love's, the Plaintiff, Elton Jones, suffered wage loss in an amount to be determined at trial.
11. As a further proximate result thereof, the Plaintiff, Elton Jones, has incurred expenses related to the repair and replacement of his work vehicle, as well as significant downtime.
12. As a further proximate result thereof, this Plaintiff has sustained a direct earnings loss in an amount to be determined at the time of the trial and has sustained an impairment of his earning capacity.

WHEREFORE, the Plaintiff, Elton Jones, demands judgment against the Defendant, Love's, in an amount in excess of Twenty-Five Thousand Dollars (\$25,000.00), plus interest,

Respectfully submitted,

/s/ Shawn M. Riehl
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JURY DEMAND

Plaintiffs demand a trial by jury of eight (8) on all issues of the within cause.

/s/ Shawn M. Riehl
Shawn M. Riehl (0081180)